



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, ID 83706 • (208) 373-0502  
www.deq.idaho.gov

Brad Little, Governor  
John Tippets, Director

April 30, 2020

Stan Case, Plant Manager  
The Amalgamated Sugar Company LLC  
P.O. Box 700  
Paul, ID 83347

RE: Facility ID No. 067-00001, The Amalgamated Sugar Company LLC, Paul  
Final Tier I Operating Permit Letter

Dear Mr. Case:

The Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. T1- 2019.0020 to The Amalgamated Sugar Company LLC at Paul in accordance with IDAPA 58.01.01.300 through 386, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units. This permit replaces Tier I Operating Permit No. T1-2017.0057 issued February 23, 2018. The enclosed operating permit is based on the information contained in your permit application received on April 5, 2019. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the Rules.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Regional Manager – Air Quality and Remediation, at (208) 736-2190 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

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 Kelli Wetzel at (208) 373-0502 or [kelli.wetzel@deq.idaho.gov](mailto:kelli.wetzel@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\kw

Permit No. T1-2019.0020 PROJ 62215

Enclosure

# Air Quality

## TIER I OPERATING PERMIT

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**Permittee** The Amalgamated Sugar Company LLC - Paul  
**Permit Number** T1-2019.0020  
**Project ID** 62215  
**Facility ID** 067-00001  
**Facility Location** 50 South 500 West  
Paul, ID 83347

### Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules) (IDAPA 58.01.01.300–386) (b) incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210 and the permittee elects not to incorporate those terms and conditions into this operating permit.

The permittee shall comply with the terms and conditions of this permit. The effective date of this permit is the date of signature by DEQ on this cover page.

**Date Issued** April 30, 2020

**Date Expires** April 30, 2025



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**Kelli Wetzel, Permit Writer**



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**Mike Simon, Stationary Source Manager**

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# 1 Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BMP	best management practices
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CaO	calcium oxide
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	CO <sub>2</sub> equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Idaho Department of Environmental Quality
dscf	dry standard cubic feet
EPA	United States Environmental Protection Agency
GHG	greenhouse gases
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HHV	higher heating value
hp	horsepower
hr/yr	hours per consecutive 12-calendar-month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
iwg	inches of water gauge
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
MRRR	Monitoring, Recordkeeping and Reporting Requirements
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
O&M	operation and maintenance
O <sub>2</sub>	oxygen
PC	permit condition
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers

PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTE	potential to emit
PW	process weight rate
RICE	reciprocating internal combustion engines
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>X</sub>	sulfur oxides
TASCO	The Amalgamated Sugar Company LLC
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar-month period
T1	Tier I operating permit
T2	Tier II operating permit
ULSD	ultra low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compound

## 2 Permit Scope

### Purpose

- 2.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the Rules.
- 2.2 This Tier I operating permit incorporates the following permit(s):
- Permit to Construct No. P-2010.0043 PROJ 61325, issued March 18, 2014;
  - Permit to Construct No. P-2017.0012 PROJ 62363, issued April 30, 2020.
- 2.3 This Tier I operating permit replaces the following permit(s):
- Tier I Operating Permit No. T1-2017.0057, issued February 23, 2018.

### Regulated Sources

Table 2.1 lists all sources of regulated emissions in this permit.

**Table 2.1 Regulated Sources**

Permit Section	Source	Control Equipment
3 & 4	<u>B&amp;W Boiler (S-B1)</u> Operational Capacity: 175,000 lb/hr steam Fuel: natural gas	Low NO <sub>x</sub> burners
	<u>Rentech Boiler (S-B4)</u> Operational Capacity: 300,000 lb/hr steam (gas) Fuel: natural gas	Low NO <sub>x</sub> burners
	<u>Nebraska Boiler (S-B3, Backup Boiler)</u> Operational Capacity: 200,000 lb/hr steam Heat Input Rate: 250 MMBtu/hr Fuel: natural gas	Low NO <sub>x</sub> burners
3 & 5	<u>North Pulp Dryer (S-D2)</u> PW input rate: 56.9 T/hr Fuel consumption: 5.7 T/hr Fuel: coal and/or natural gas	Dryer exhaust is split between two cyclones (A-D2A) that operate in parallel. Cyclone exhaust is combined and then split between two Spray-Impingement Scrubbers (A-D2B) that operate in parallel.
	<u>South Pulp Dryer (S-D1)</u> PW input rate: 48.5 T/hr Fuel consumption: 4.9 T/hr Fuel: coal and/or natural gas	Dryer exhaust is split between two cyclones (A-D1A) that operate in parallel. Cyclone exhaust is combined and then split between two Spray-Impingement Scrubbers (A-D1B) that operate in parallel.
3 & 6	<u>Pellet Cooler No. 1 (S-D3)</u> Manufacturer/Model: California Pellet Mill/2GA3 PW input rate: 7.5 T/hr	Cyclone (A-D3)
	<u>Pellet Cooler No. 2 (S-D4)</u> Manufacturer/Model: California Pellet Mill/2GA3 PW input rate: 7.5 T/hr	Cyclone (A-D4/5)
	<u>Pellet Cooler No. 3 (S-D5)</u> Manufacturer/Model: California Pellet Mill/2GA3 PW input rate: 7.5 T/hr	
Permit Section	Source	Control Equipment

3 & 7	<u>Lime Kiln System (S-K1)</u> Manufacturer: Eberhardt Model: KR 8.0 (forced draft, vertical) Manufacture date: 2011 Maximum capacity: 770 T/day lime rock Maximum operation: 146,300 T/yr lime rock Fuel consumption: 55.2 T/day, 59 MMBtu/hr Fuels: anthracite coal and/or coke	Gas Washer First Carbonation Tank Second Carbonation Tank (A-K1)
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### 3 Facility-Wide Conditions

Table 3.1 contains a summary of requirements that apply generally to emissions units at the facility.

**Table 3.1 Applicable Requirements Summary**

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
3.1	Definitions	Definitions for permit conditions	P-2017.0012	3.1
3.2 – 3.4	Beet Throughput	21,550 T/day 3,852,000 T/yr	P-2017.0012 40 CFR 52.21	3.4, 3.32, 3.38
3.5	NSR Applicability Determinations	Compliance with 40 CFR 52.21	P-2017.0012 40 CFR 52.21	3.5, 3.32, 3.38
3.6-3.9	Fugitive Dust	Reasonable control	IDAPA 58.01.01.650–651	3.7–3.9, 3.32, 3.38
3.10, 3.11	Odors	Reasonable control	IDAPA 58.01.01.775–776	3.11, 3.32, 3.38
3.12-3.14	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.13, 3.14, 3.32, 3.38
3.15-3.19	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130–136	3.16-3.19, 3.32, 3.38
3.20, 3.21	Sulfur Content	ASTM grade No. 1 fuel oil ≤ 0.3% by weight ASTM grade No. 2 fuel oil ≤ 0.5% by weight	IDAPA 58.01.01.725 P-2010.0043	3.21, 3.32, 3.38
3.22	Open Burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600–623	3.22, 3.32, 3.38
3.23	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	3.23, 3.32, 3.38
3.24	Accidental Release Prevention	Compliance with 40 CFR 68	40 CFR 68	3.24, 3.32, 3.38
3.25	Recycling and Emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	3.25, 3.32, 3.38
3.26, 3.27	NSPS/NESHAP General Provisions	Compliance with 40 CFR 60/63, Subpart A	IDAPA 58.01.01.107.03	3.26, 3.27, 3.32, 3.38
3.28 – 3.31	Operation and Maintenance	Compliance with O&M requirements	P-2010.0043 IDAPA 58.01.01.322	3.28 – 3.32, 3.38
3.32	Monitoring and Recordkeeping	Maintenance of required records	IDAPA 58.01.01.322.06	3.32, 3.38
3.33-3.37	Testing	Compliance testing	IDAPA 58.01.01.157	3.33–3.37, 3.32, 3.38
3.38	Reports and Certifications	Submittal of required reports, notifications, and certifications	IDAPA 58.01.01.322.08	3.38
3.39	Incorporation of Federal Requirements by Reference	Compliance with applicable federal requirements referenced	IDAPA 58.01.01.107	3.39

#### Definitions

**3.1** “Campaign year” shall be defined as the year beginning October 1 and ending the following year on September 30.

[PTC No. P-2017.0012, 4/30/2020]

#### Beet Throughput

**3.2** Throughput of beets to the facility shall not exceed 21,550 tons per day (T/day).

[PTC No. P-2017.0012, 4/30/2020]

- 3.3 Throughput of beets to the facility shall not exceed 3,852,000 tons per campaign year.  
[PTC No. P-2017.0012, 4/30/2020; 40 CFR 52.21]
- 3.4 The permittee shall monitor and record the daily and annual beet throughput to the facility to demonstrate compliance with throughput limits (Permit Conditions 3.2 –3.3). Annual throughput shall be determined by summing each daily throughput monthly, and then summing each monthly throughput for the campaign year. A compilation of the most recent two campaign years of records shall be kept onsite and shall be made available to DEQ representatives upon request.  
[PTC No. P-2017.0012, 4/30/2020]

### **NSR Applicability Determinations**

- 3.5 The permittee shall not benefit from emission decreases that result from (or were projected to result from) the elimination of coal as fuel for the boilers for any future NSR applicability determinations and emissions netting calculations under the PSD program.
- Baseline actual emissions calculated from the boilers for any future NSR applicability determination shall be adjusted downward, under 40 CFR 52.21(b)(48)(ii)(b), to reflect emissions that would have occurred if the boilers had combusted natural gas, not coal.
  - NSR emission decreases from the conversion of the boilers from coal firing to natural gas-firing only are not creditable for the purposes of calculating NSR pollutant net emissions increases under 40 CFR 52.21(b)(3).  
[PTC No. P-2017.0012, 4/30/2020]

### **Fugitive Dust**

- 3.6 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651.  
[IDAPA 58.01.01.650–651, 4/11/2015]
- 3.7 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive emissions.  
[IDAPA 58.01.01.322.06, 07, 5/1/1994]
- 3.8 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving 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.  
[IDAPA 58.01.01.322.06, 07, 5/1/1994]
- 3.9 The permittee shall conduct a monthly 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.  
[IDAPA 58.01.01.322.06, 07, 5/1/1994]

## Odors

**3.10** 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.

[IDAPA 58.01.01.775–776 (state only), 5/1/1994]

**3.11** 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.

[IDAPA 58.01.01.322.06, 07 (state only), 5/1/1994]

## Visible Emissions

**3.12** 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.

[IDAPA 58.01.01.625, 4/5/2000]

**3.13** The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) 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%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.

[IDAPA 58.01.01.322.06, 5/1/1994]

**3.14** The permittee shall maintain records of the results of each visible emission 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.

[IDAPA 58.01.01.322.07, 5/1/1994]

## Excess Emissions

### *Excess Emissions-General*

- 3.15** The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions. The provisions of IDAPA 58.01.01.130–136 shall govern in the event of conflicts between the excess emissions facility wide conditions (Permit Conditions 3.15 through 3.18) and the regulations of IDAPA 58.01.01.130–136.

During an excess emissions event, the permittee shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/2000]

### *Excess Emissions-Startup, Shutdown, and Scheduled Maintenance*

- 3.16** In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

- Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.
- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the permittee demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
- Reporting and recording the information required pursuant to the excess emissions reporting and recordkeeping requirements (Permit Conditions 3.13 and 3.14) and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133, 4/11/2006]

### *Excess Emissions-Upset, Breakdown, or Safety Measures*

- 3.17** In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

- Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
- Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
- Report and record the information required pursuant to the excess emissions reporting and recordkeeping facility wide conditions (Permit Conditions 3.13 and 3.14) and

IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

- During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

[IDAPA 58.01.01.134, 4/11/2006]

### ***Excess Emissions-Reporting and Recordkeeping***

- 3.18** The permittee shall submit a written report to DEQ for each excess emissions event, no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135, 4/11/2006]

- 3.19** The permittee shall maintain excess emissions records at the facility for the most recent five calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

- An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and
- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the permittee in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136, 4/5/2000]

### **Sulfur Content**

- 3.20** The permittee shall not sell, distribute, use, or make available for use any of the following:

- 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
- Coal containing greater than 1.0% sulfur by weight
- DEQ may approve an exemption from these fuel sulfur content requirements (IDAPA 58.01.01.725.01 725.04) if the permittee demonstrates that, through control measures or other means, SO<sub>2</sub> emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 4/11/2015]

- 3.21** For each shipment of fuel received, the permittee shall either obtain samples and a laboratory analysis, or obtain and maintain at the facility fuel receipts from the fuel supplier, which demonstrate the type of fuel in each shipment and that each shipment received complies with the fuel sulfur content limits specified in the fuel sulfur content permit condition (Permit Condition 3.20).

[PTC No. P-2010.0043, 3/18/14; IDAPA 58.01.01.322.07, 5/1/1994]

## **Open Burning**

**3.22** The permittee shall comply with the “Rules for Control of Open Burning” (IDAPA 58.01.01.600–623).

[IDAPA 58.01.01.600–623, 3/29/2012]

## **Asbestos**

**3.23 NESHAP 40 CFR 61, Subpart M—National Emission Standard for Asbestos**

The permittee shall comply with all applicable requirements of 40 CFR 61, Subpart M—“National Emission Standard for Asbestos.”

[40 CFR 61, Subpart M]

## **Accidental Release Prevention**

**3.24** A permittee of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the “Chemical Accident Prevention Provisions” at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10(a)]

## **Recycling and Emissions Reductions**

**3.25 40 CFR Part 82—Protection of Stratospheric Ozone**

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, “Recycling and Emissions Reduction.”

[40 CFR 82, Subpart F]

## NSPS/NESHAP General Provisions

### 3.26 NSPS 40 CFR 60, Subpart A-General Provisions

The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A-“General Provisions”-in accordance with 40 CFR 60.1. A summary of requirements for affected facilities is provided in Table 3.2.

**Table 3.2 NSPS 40 CFR 60, Subpart A - Summary of General Provisions**

Section	Subject	Summary of Section Requirements
60.4	Address	<ul style="list-style-type: none"> <li>All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart(s) shall be submitted to: Twin Falls Regional Office 650 Addison Avenue West, Suite 110 Twin Falls, ID 83301</li> </ul>
60.7(a), (b), and (f)	Notification and Recordkeeping	<ul style="list-style-type: none"> <li>Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date.</li> <li>Notification shall be furnished of initial startup postmarked within 15 days of such date.</li> <li>Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made.</li> <li>Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative.</li> <li>Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.</li> </ul>
60.8	Performance Tests	<ul style="list-style-type: none"> <li>At least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present.</li> <li>Within 60 days of achieving the maximum production rate, but not later 180 days after initial startup, performance test(s) shall be conducted and a written report of the results of such test(s) furnished.</li> <li>Performance testing facilities shall be provided as follows: <ul style="list-style-type: none"> <li>Sampling ports adequate for test methods applicable to such facility.</li> <li>Safe sampling platform(s).</li> <li>Safe access to sampling platform(s).</li> <li>Utilities for sampling and testing equipment.</li> </ul> </li> <li>Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f)</li> </ul>
60.11(a), (d), (f), and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> <li>When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8.</li> <li>At all times, including periods of startup, shutdown, and malfunction, the owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.</li> <li>For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.</li> </ul>
60.11(b), (c), and (e)	Compliance with Standards and Maintenance Requirements (Opacity)	<ul style="list-style-type: none"> <li>Compliance with opacity standards shall be determined by Method 9 in Appendix A of 40 CFR 60. The permittee may elect to use COM measurements in lieu of Method 9, provided notification is made at least 30 days before the performance test.</li> <li>The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided.</li> <li>Opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 in accordance with the requirements and exceptions in 40 CFR 60.11(e).</li> </ul>

**Table 3.2 NSPS 40 CFR 60, Subpart A – Summary of General Provisions (continued)**

Section	Subject	Summary of Section Requirements
60.12	Circumvention	<ul style="list-style-type: none"> <li>No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.</li> </ul>
60.13	Monitoring Requirements (CMS)	<ul style="list-style-type: none"> <li>All CMS and monitoring devices shall be installed and operational prior to conducting performance tests required by 40 CFR 60.8.</li> <li>A performance evaluation of the COMS or CEMS shall be conducted before or during any performance test and a written report of the results of the performance evaluation furnished. Reporting requirements include submitting performance evaluations reports within 60 days of the evaluations required by this section, and submitting results of the performance evaluations for the COM within 10 days before a performance test, if using a COM to determine compliance with opacity during a performance test instead of Method 9.</li> <li>The zero and span calibration drifts must be checked at least once daily and adjusted in accordance with the requirements in 40 CFR 60.13(d).</li> <li>The zero and upscale (span) calibration drifts of a COMS must be automatically, intrinsic to the opacity monitor, checked at least once daily.</li> <li>Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CMS shall be in continuous operation and shall meet minimum frequency of operation requirements as specified in 40 CFR 60.13(e).</li> <li>All CMS or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. CMS shall be located and installed in accordance with the requirements in 40 CFR 60.13(f) and (g).</li> <li>Data shall be reduced and computed in accordance with the procedures in 40 CFR 60.13(h), (i), and (j).</li> </ul>
60.14	Modification	<ul style="list-style-type: none"> <li>A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14.</li> <li>Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.</li> </ul>
60.15	Reconstruction	<ul style="list-style-type: none"> <li>An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.</li> </ul>

**[40 CFR 60, Subpart A]**

### 3.27 NESHAP 40 CFR 63, Subpart A—General Provision

The permittee shall comply with the requirements of 40 CFR 63, Subpart A—“General Provisions.” A summary of applicable requirements for affected sources is provided in Table 3.3.

**Table 3.3 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources**

Section	Subject	Summary of Section Requirements		
63.13	Address	<ul style="list-style-type: none"> <li>• All requests, reports, applications, submittals, and other communications associated with 40 CFR 63, Subpart(s) shall be submitted to:               <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">Director Air and Waste US EPA 1200 Sixth Ave. Seattle, WA 98101</td> <td style="width: 50%; border: none;">Twin Falls Regional Office 650 Addison Avenue West, Suite 110 Twin Falls, ID 83301</td> </tr> </table> </li> </ul>	Director Air and Waste US EPA 1200 Sixth Ave. Seattle, WA 98101	Twin Falls Regional Office 650 Addison Avenue West, Suite 110 Twin Falls, ID 83301
Director Air and Waste US EPA 1200 Sixth Ave. Seattle, WA 98101	Twin Falls Regional Office 650 Addison Avenue West, Suite 110 Twin Falls, ID 83301			
63.4(a)	Prohibited Activities	<ul style="list-style-type: none"> <li>• No permittee must operate any affected source in violation of the requirements of 40 CFR 63 in accordance with 40 CFR 63.4(a). No permittee subject to the provisions of this part shall fail to keep records, notify, report, or revise reports as required under this part.</li> </ul>		
63.4(b)	Circumvention/ Fragmentation	<ul style="list-style-type: none"> <li>• No permittee shall build, erect, install or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard.</li> <li>• Fragmentation which divides ownership of an operation, within the same facility among various owners where there is no real change in control, will not affect applicability in accordance with 40 CFR 63.4(c).</li> </ul>		
63.6(b) and (c)	Compliance Dates	<ul style="list-style-type: none"> <li>• The permittee of any new or reconstructed source must comply with the relevant standard as specified in 40 CFR 63.6(b).               <ul style="list-style-type: none"> <li>◦ The permittee of a source that has an initial startup before the effective date of a relevant standard must comply not later than the standard's effective date in accordance with 40 CFR 63.6(b)(1).</li> <li>◦ The permittee of a source that has an initial startup after the effective date of a relevant standard must comply upon startup of the source in accordance with 40 CFR 63.6(b)(2).</li> </ul> </li> <li>• The permittee of any existing sources must comply with the relevant standard by the compliance date established in the applicable subpart or as specified in 40 CFR 63.6(c).               <ul style="list-style-type: none"> <li>◦ The permittee of an area source that increases its emissions of hazardous air pollutants such that the source becomes a major source shall be subject to relevant standards for existing sources in accordance with 40 CFR 63.6(c)(5).</li> </ul> </li> </ul>		
63.6(e) and (f)	Compliance with Standards and Maintenance Requirements (Non-Opacity)	<ul style="list-style-type: none"> <li>• At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions in accordance with 40 CFR 63.6(e).</li> <li>• The permittee of an affected source must develop a written startup, shutdown, and malfunction plan and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard in accordance with 40 CFR 63.6(e). The permittee must maintain the current plan at the affected source and must make the plan available upon request. If the plan fails to address or inadequately addresses a malfunction, the permittee must revise the plan within 45 days after the event.</li> <li>• The permittee must record and report actions taken during a startup, shutdown, or malfunction in accordance with the requirements in 40 CFR 63.6(e). The permittee shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the plan in the semiannual startup, shutdown, and malfunction report.</li> <li>• Non-opacity emission standards shall apply at all times except during periods of startup, shutdown, and malfunction, and as otherwise specified, in accordance with 40 CFR 63.6(f).</li> </ul>		

**Table 3.3 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources (continued)**

Section	Subject	Summary of Section Requirements
63.7	Performance Testing Requirements	<ul style="list-style-type: none"> <li>• If required to do performance testing, the permittee must perform such tests within 180 days of the compliance date in accordance with 40 CFR 63.7(a).</li> <li>• The permittee must notify in writing of the intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin to allow review of the site-specific test plan and to have an observer present during the test in accordance with 40 CFR 63.7(b).</li> <li>• Before conducting a required performance test, the permittee shall develop and, if requested, shall submit a site-specific test plan for approval in accordance with 40 CFR 63.7(c). The test plan shall include a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program.</li> <li>• If required to do performance testing, the permittee shall provide performance testing facilities in accordance with 40 CFR 63.7(d):               <ul style="list-style-type: none"> <li>○ Sampling ports adequate for test methods applicable to such source.</li> <li>○ Safe sampling platform(s);</li> <li>○ Safe access to sampling platform(s);</li> <li>○ Utilities for sampling and testing equipment; and</li> <li>○ Any other facilities deemed necessary for safe and adequate testing of a source.</li> </ul> </li> <li>• Performance tests shall be conducted and data reduced in accordance with 40 CFR 63.7(e) and (f).</li> <li>• The permittee shall report the results of the performance test before the close of business on the 60th day following the completion of the test, unless specified or approved otherwise in accordance with 40 CFR 63.7(g).</li> </ul>
63.9	Notification Requirements	<ul style="list-style-type: none"> <li>• The permittee of an affected source that has an initial startup before the effective date of a relevant standard shall notify in writing that the source is subject to the relevant standard, in accordance with 40 CFR 63.9(b)(2). The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information:               <ul style="list-style-type: none"> <li>○ The name and address of the permittee;</li> <li>○ The address (i.e., physical location) of the affected source;</li> <li>○ An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;</li> <li>○ A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and</li> <li>○ A statement of whether the affected source is a major source or an area source.</li> </ul> </li> <li>• The permittee of a new or reconstructed major affected source for which an application for approval of construction or reconstruction is required must provide the following information in writing in accordance with 40 CFR 63.9(b)(4):               <ul style="list-style-type: none"> <li>○ A notification of intention to construct a new major-emitting affected source, reconstruct a major-emitting affected source, or reconstruct a major source such that the source becomes a major-emitting affected source;</li> <li>○ A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date.</li> </ul> </li> <li>• The permittee of a new or reconstructed affected source for which an application for approval of construction or reconstruction is not required must provide the following information in writing in accordance with 40 CFR 63.9(b)(5):               <ul style="list-style-type: none"> <li>○ A notification of intention to construct a new affected source, reconstruct an affected source, or reconstruct a source such that the source becomes an affected source, and</li> <li>○ A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date.</li> <li>○ Unless the permittee has requested and received prior permission, the notification must include the information required in the application for approval of construction or reconstruction as specified in 40 CFR 63.5(d)(1).</li> </ul> </li> </ul>

**Table 3.3 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources (continued)**

Section	Subject	Summary of Section Requirements
63.9	Notification Requirements (continued)	<ul style="list-style-type: none"> <li>• The permittee shall notify in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin to allow the opportunity to review and approve the site-specific test plan required by 40 CFR 63.7(c), and to have an observer present during the test.</li> <li>• The permittee of an affected source shall notify in writing of the anticipated date for conducting the opacity or visible emission observations in accordance with 40 CFR 63.9(f), if such observations are required.</li> <li>• Each time a notification of compliance status is required under this part, the permittee of such source shall submit a notification of compliance status in accordance with 40 CFR 63.9(h)(2)(i). The notification shall list:               <ul style="list-style-type: none"> <li>○ The methods that were used to determine compliance;</li> <li>○ The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;</li> <li>○ The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;</li> <li>○ The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard;</li> <li>○ If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification);</li> <li>○ A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and</li> <li>○ A statement by the permittee of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements.</li> </ul> </li> <li>• The notification must be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard unless otherwise specified in accordance with 40 CFR 63.9(h)(2)(ii). If no performance test is required but opacity or visible emission observations are required to demonstrate compliance with a standard, the notification shall be sent before close of business on the 30th day following the completion of the observations.</li> <li>• Each time a notification of compliance status is required under this part, the permittee of such source shall submit the notification of compliance status following completion of the relevant compliance demonstration activity specified.</li> <li>• If a permittee submits estimates or preliminary information in an application in place of the actual emissions data or control efficiencies, the permittee shall submit the actual emissions data and other correct information as soon as available but no later than with the initial notification of compliance status required in this section in accordance with 40 CFR 63.9(h)(5).</li> <li>• Any change in the information already provided under this section shall be provided in writing within 15 calendar days after the change in accordance with 40 CFR 63.9(j).</li> </ul>

**Table 3.3 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources (continued)**

Section	Subject	Summary of Section Requirements
63.10	Recordkeeping and Reporting Requirements	<ul style="list-style-type: none"> <li>• The permittee shall maintain files of all required information recorded in a form suitable and readily available for expeditious inspection and review in accordance with 40 CFR 63.10(b)(1). The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site.</li> <li>• The permittee shall maintain relevant records of the following in accordance with 40 CFR 63.10(b)(2);             <ul style="list-style-type: none"> <li>○ The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards;</li> <li>○ The occurrence and duration of each malfunction of operation or the required air pollution control and monitoring equipment;</li> <li>○ All required maintenance performed on the air pollution control and monitoring equipment;</li> <li>○ Actions taken during periods of startup or shutdown when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan; or</li> <li>○ Actions taken during periods of malfunction when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan;</li> <li>○ All information necessary, including actions taken, to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan (see 40 CFR 63.6(e)(3)) when all actions taken during periods of startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist," or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events);</li> <li>○ Each period during which a CMS is malfunctioning or inoperative (including out-of-control periods);</li> <li>○ All required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report);</li> <li>○ All results of performance tests, CMS performance evaluations, and opacity and visible emission observations;</li> <li>○ All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;</li> <li>○ All CMS calibration checks;</li> <li>○ All adjustments and maintenance performed on CMS;</li> <li>○ All emission levels relative to the criterion for obtaining permission to use an alternative to the relative accuracy test, if the source has been granted such permission under 40 CFR 63.8(f)(6); and</li> <li>○ All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.</li> </ul> </li> <li>• If an permittee determines that his or her stationary source that emits one or more HAP, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to a relevant standard because of limitations on the source's potential to emit or an exclusion, the permittee must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first in accordance with 40 CFR 63.10(b).</li> </ul>

[40 CFR 63, Subpart A]

## Operation and Maintenance

**3.28** 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.

[40 CFR 64.6(c)(1)(ii); IDAPA 58.01.01.322.06, 5/1/1994]

**3.29** The permittee shall maintain an operation and maintenance (O&M) manual for control equipment and for monitoring equipment relevant to the following sources: (a) the pulp dryers, (b) the pellet coolers, and (c) the kiln. Any changes to the O&M manual shall be submitted to DEQ at the address provided (Permit Condition 3.38) for review and comment, within 15 days of the change.

[PTC No. P-2010.0043, 3/18/14; IDAPA 58.01.01.322.06, 5/1/1994]

**3.30** The O&M manual shall be a permittee developed document based upon, but independent from, the manufacturer supplied operating manual(s). The O&M manuals shall include, at a minimum:

- A general description of the control equipment;
- Procedures that will be followed to ensure compliance with emission limits (Permit Conditions 3.12 through 3.14, 5.1, 6.1, and 7.1 through 7.3), the control equipment maintenance and operation general provision (Permit Condition 3.28), and the manufacturer's specifications;
- Schedule and procedures for corrective action that will be taken if visible emissions are present from the control equipment at any time, including procedures to determine whether bags or cartridges are ruptured, and procedures to determine if bags or cartridges are not appropriately secured in place;
- Unless otherwise specified in this permit, a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges where applicable, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, any specific control device monitoring parameter(s) required under any permit condition in this permit, unless DEQ approves their removal from this permit condition. The control device monitoring program shall be developed by the permittee based on performance test results, vendor data, and/or other supporting documentation. Whenever an operating parameter is outside the operating range specified by a control device monitoring program, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards, unless DEQ determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required.
- Procedures for periodic calibration of each water flow meter and each pressure gauge (including manometers) on at least an annual basis and to an accuracy of within  $\pm 5\%$  of span, or on a frequency and to an accuracy as specified by the manufacturer.
- The recommended minimum value that shall be maintained for the water flow rate to the gas washer for the kiln (Permit Condition 7.5);
- The recommended minimum value that shall be maintained for the pressure drop across the gas washer for the kiln (Permit Condition 7.6);
- Procedures for normal operating conditions, startup, shutdown, and maintenance;

- Procedures for upset conditions and corrective actions to be taken;
- Methods of preventing malfunctions;
- Quality assurance and quality control (QA/QC) practices to ensure data validity for each water flow meter and each pressure gauge. QA/QC practices shall comply with manufacturer's recommendations or as otherwise approved by DEQ.
- In the event that a monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.
- Provisions for annual inspections during planned maintenance outages.

[PTC No. P-2010.0043, 3/18/14; IDAPA 58.01.01.322.06-07, 5/1/1994]

**3.31** The permittee shall calibrate, maintain and operate control equipment in accordance with the O&M manual. The procedures specified in the O&M manual are incorporated by reference into this permit and are enforceable permit conditions. The O&M manual and copies of any manufacturer's manual(s) and recommendations shall be maintained onsite and shall be made available to DEQ representatives upon request. The permittee shall keep records of inspection and maintenance activities for a period of five years, in accordance with the monitoring and recordkeeping facility-wide condition (Permit Condition 3.32).

[PTC No. P-2010.0043, 3/18/14; IDAPA 58.01.01.322.06-07, 5/1/1994]

## Monitoring and Recordkeeping

**3.32** The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Monitoring records 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, 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 58.01.01.322.06, 07, 5/1/1994]

## Performance Testing

**3.33** If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

**3.34** All 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, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used.
- Any extenuating or unusual circumstances regarding the proposed test.
- The proposed schedule for conducting and reporting the test.

[IDAPA 58.01.01.157, 4/11/15; IDAPA 58.01.01.322.06, 08.a, 09, 4/5/2000]

**3.35** Within 60 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 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.

**3.36** If testing is required, the following test methods shall be used, unless otherwise specified or approved by DEQ in accordance with IDAPA 58.01.01.157.02:

**Table 3.4 EPA Reference Test Methods**

Pollutant	Test Method <sup>(a)</sup>	Special Conditions
PM <sub>10</sub>	EPA Methods 201A <sup>(b)</sup> / 202	Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
PM	EPA Method 5	
NO <sub>x</sub>	EPA Method 7	
SO <sub>2</sub>	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	For an NSPS source, use IDAPA 58.01.01.625 and Method 9. For other sources, use IDAPA 58.01.01.625 only.
Sulfur content	ASTM Method D3177-75 or D4239-85	Sulfur content of coal and coke fuels.

a) Or a DEQ-approved alternative in accordance with IDAPA 58.01.01.157.

b) EPA Method 201A is not applicable for wet scrubber controlled sources.

[PTC No. P-2010.0043, 3/18/14; IDAPA 58.01.01.322.09, 5/1/1994]

**3.37** The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the “Reports and Certifications” facility wide condition (Permit Condition 3.38).

[IDAPA 58.01.01.157, 4/11/15; IDAPA 58.01.01.322.06, 08.a, 09, 4/5/2000]

## Reports and Certifications

**3.38** All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130–136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance  
 Department of Environmental Quality  
 Twin Falls Regional Office  
 650 Addison Avenue West, Suite 110  
 Twin Falls, ID 83301  
 Phone: (208) 736-2190  
 Fax: (208) 736-2194

The periodic compliance certification required in the general provisions (General Provision 11.22) shall also be submitted within 30 days of the end of the specified reporting period to:

Part 70 Operating Permit Program  
U.S. EPA Region 10, Mail Stop: OAW-150  
1200 Sixth Ave., Suite 155  
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 4/5/2000]

### **Incorporation of Federal Requirements by Reference**

**3.39** Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60, including Subparts A and Db.
- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63, including Subparts A and DDDDD.

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[IDAPA 58.01.01.107, 3/29/2017]

## 4 B&W, Rentech, and Nebraska Boilers

### Summary Description

This section provides a summary description of the Babcock & Wilcox boiler (B&W boiler), Rentech boiler, and Nebraska boiler and has been provided for informational purposes.

The facility boiler house steam plant which includes the B&W boiler, the Rentech boiler, and the Nebraska boiler (used for backup only) provide steam to the facility.

Table 4.1 describes the devices used to control emissions from the facility boilers.

**Table 4.1 B&W, Rentech, and Nebraska Boilers Description**

Emissions Units / Processes	Control Devices
B&W Boiler (S-B1)	Low NO <sub>x</sub> burners
Rentech Boiler (S-B4)	Low NO <sub>x</sub> burners
Nebraska Boiler (S-B2)	Low NO <sub>x</sub> burners

Table 4.2 contains only a summary of the requirements that apply to the B&W, Rentech, and Nebraska boilers. Specific permit requirements are listed below.

**Table 4.2 Applicable Requirements Summary**

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
3.12	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.13 – 3.14, 3.32, 3.38
4.1	PM	<u>Natural gas only</u> 0.015 gr/dscf at 3% O <sub>2</sub>	IDAPA 58.01.01.676–677 40 CFR 64	4.1, 3.32, 3.38
4.2, 4.3	NO <sub>x</sub>	0.10 lb/MMBtu	40 CFR 60.44b(a)	4.11 – 4.18, 3.32, 3.38
4.4	Boiler Emission Limits	PM <sub>10</sub> – 14.4 T/yr <sup>(a)</sup> SO <sub>2</sub> – 1.20 T/yr <sup>(a)</sup> NO <sub>x</sub> – 132.0 T/yr <sup>(a)</sup> CO – 156.4 T/yr <sup>(a)</sup> VOC – 10.4 T/yr <sup>(a)</sup>	P-2017.0012	4.5 – 4.7, 3.32, 3.38
4.5	Boiler Fuel Usage	Natural gas only	P-2017.0012	4.5, 3.32, 3.38
4.6	Boiler Operating Requirements	Only two of the three boilers operating simultaneously	P-2017.0012	4.6, 3.32, 3.38
4.7	Boiler Operating Limits	40,000,000 therms per campaign year <sup>(a)</sup>	P-2017.0012	4.10, 3.32, 3.38
4.19 – 4.27	Boiler MACT	Compliance with NESHAP 40 CFR 63, Subparts A and DDDDD	P-2017.0012, 40 CFR 63, Subparts A and DDDDD	4.19 – 4.27, 3.32, 3.38

a) The boiler emission limits and therm limit is a combined limit for all facility boilers.

## Emission Limits

### 4.1 PM Limit Fuel Burning Equipment

The permittee shall not discharge to the atmosphere from any fuel-burning equipment in operation on or after October 1, 1979 or with a maximum rated input of 10 MMBtu/hr or more, PM in excess of the concentrations shown in Table 4.3. The effluent gas volume shall be corrected to the oxygen concentration shown. The B&W, Rentech, and Nebraska boilers are fuel-burning equipment as defined in IDAPA 58.01.01.006.

**Table 4.3 Fuel-Burning Equipment Grain-Loading Standards**

Fuel Type	Allowable Particulate Emissions (gr/dscf)	Oxygen
Natural Gas	0.015 gr/dscf	3%

[IDAPA 58.01.01.676, 5/1/1994]

### 4.2 NO<sub>x</sub> Emission Limit

In accordance with 40 CFR 60.44b(a), the NO<sub>x</sub> emissions from the Nebraska boiler stack shall not exceed 0.10 lb/MMBtu.

[40 CFR 60.44b(a)]

### 4.3 NO<sub>x</sub> Emission Limit

In accordance with 40 CFR 60.44b(a), the NO<sub>x</sub> emissions from the Rentech boiler stack shall not exceed 0.10 lb/MMBtu.

[40 CFR 60.44b(a)]

### 4.4 Emissions Limits

The emissions from the B&W, Rentech, and Nebraska boiler stacks shall not exceed any corresponding emissions rate limits listed in Table 4.4.

**Table 4.4 B&W, Rentech, and Nebraska Boiler Emission Limits<sup>(a)</sup>**

Source Description	PM <sub>10</sub> <sup>(b)</sup>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
	T/yr <sup>(c)</sup>	T/yr <sup>(c)</sup>	T/yr <sup>(c)</sup>	T/yr <sup>(c)</sup>	T/yr <sup>(c)</sup>
B&W boiler	14.4	1.20	132.0	156.4	10.4
Rentech boiler					
Nebraska boiler					

- In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- Tons per campaign year, as defined in Permit Condition 3.1.

[PTC No. P-2017.0012, 4/30/2020]

## Operating Requirements

### 4.5 Fuel

The B&W boiler, Rentech boiler, and Nebraska boiler shall combust natural gas only.

[PTC No. P-2017.0012, 4/30/2020]

#### **4.6 Boiler Operating Requirements**

Following the shutdown of the Erie City boiler, the permittee shall not operate more than two of the three boilers (B&W, Rentech, and Nebraska boilers) simultaneously, except during periods of start-up and shut down of a boiler when the three boilers may be partially operated.

[PTC No. P-2017.0012, 4/30/2020]

#### **4.7 Boiler Operating Limits**

To demonstrate compliance with the Emissions Limits permit condition, operation of the B&W boiler, Rentech boiler, and Nebraska boiler shall not exceed 40,000,000 therms (for all boilers combined) for the campaign year as defined in Permit Condition 3.1.

[PTC No. P-2017.0012, 4/30/2020]

#### **4.8 Nebraska Boiler Maximum Heat Input Capacity**

The maximum heat input capacity of the Nebraska boiler shall not exceed 250 MMBtu/hr.

[PTC No. P-2017.0012, 4/30/2020]

#### **4.9 Rentech Boiler Maximum Heat Input Capacity**

The maximum heat input capacity of the Rentech boiler shall not exceed 385 MMBtu/hr.

[PTC No. P-2017.0012, 4/30/2020]

### **Monitoring and Recordkeeping Requirements**

#### **4.10 Boiler Operation Recordkeeping**

The permittee shall monitor and record the amount of fuel used in therms per month in the B&W, Rentech, and Nebraska boilers to demonstrate compliance with operating limits permit condition. Annual fuel used shall be determined by summing the monthly operations in the boilers for the campaign year to demonstrate compliance with Permit Condition 4.7.

[PTC No. P-2017.0012, 4/30/2020]

#### **4.11 Nebraska Boiler and Rentech Boiler CEMS Emission Monitoring**

In accordance with 40 CFR 60.48b (b through f), the permittee shall install, calibrate, maintain and operate CEMS (continuous emission monitoring system) or approved alternative for measuring NO<sub>x</sub> and O<sub>2</sub> (or CO<sub>2</sub>) emissions discharged to the atmosphere from the Nebraska boiler and the Rentech boiler and shall record the output of the systems.

- The CEMS shall be operated and data recorded during all periods of operation of the affected facility except for CEMS breakdowns and repairs. Data shall be recorded during calibration checks, and zero and span adjustments.
- The 1-hour average NO<sub>x</sub> emission rates measured by the continuous NO<sub>x</sub> monitor shall be expressed as lb/MMBtu heat input and shall be used to calculate the average emission rates.
- The procedures under §60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring system. The NO<sub>x</sub> span value shall be 500 ppm or the permittee may elect to use the NO<sub>x</sub> span values determined according to section 2.1.2 in appendix A to part 75.

- When NO<sub>x</sub> emission data are not obtained because of CEMS breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7 of appendix A, Method 7A of appendix A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

[40 CFR 60.48b(b-f)]

#### 4.12 Nebraska Boiler and Rentech Boiler Recordkeeping

In accordance with 40 CFR 60.49b(g), the permittee shall maintain records of the following information for both the Nebraska boiler and Rentech boiler each operating day:

- Calendar date;
- The average hourly NO<sub>x</sub> emission rates (expressed as NO<sub>2</sub>) (ng/J or lb/MMBtu heat input) measured or predicted;
- The 30-day average NO<sub>x</sub> emission rates (ng/J or lb/MMBtu heat input) calculated at the end of each boiler operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days;
- Identification of the boiler operating days when the calculated 30-day average NO<sub>x</sub> emission rates are in excess of the NO<sub>x</sub> emissions standards under §60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken;
- Identification of the boiler operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;
- Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;
- Identification of “F” factor used for calculations, method of determination, and type of fuel combusted;
- Identification of the times when the pollutant concentration exceeded full span of the CEMS;
- Description of any modifications to the CEMS or approved alternative that could affect the ability of the CEMS or approved alternative to comply with the average hourly NO<sub>x</sub> emission rates and 30-day average NO<sub>x</sub> emission rates; and
- Results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1 of 40 CFR 60.49b.

[40 CFR 60.49b(g)]

#### 4.13 Record Retention

In accordance with 40 CFR 60.49b(o), all records required by Permit Conditions 4.11, 4.12, and 4.14 through 4.18 shall be maintained by the permittee for a period of 2 years following the date of such record.

[40 CFR 60.49b(o)]

## Performance Testing Requirements

### 4.14 Nebraska Boiler and Rentech Boiler Performance Test Requirements

In accordance with 40 CFR 60.46b(e), to determine compliance with the emission limit for NO<sub>x</sub>, the permittee shall conduct a performance test on the Rentech boiler using the continuous system for monitoring NO<sub>x</sub> as specified in Permit Condition 4.11, within 60 days of 90% full-rated capacity operation. Results of the performance test shall be submitted to DEQ within 60 days of completion of the test.

- In accordance with 40 CFR 60.46b(e)(1), for the initial compliance test the permittee shall monitor NO<sub>x</sub> from the Rentech boiler for 30 successive operating days and use the 30-day average emission rate to determine compliance with the NO<sub>x</sub> emission limit in Permit Condition 4.3. The 30-day emission rate shall be calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period.
- In accordance with 40 CFR 60.46b(e)(3), following the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, the permittee shall determine compliance with the NO<sub>x</sub> standards under §60.44b on a continuous basis through the use of a 30-day rolling average emission rate for the Rentech boiler. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NO<sub>x</sub> emission data for the preceding 30 steam generating unit operating days.
- In accordance with 40 CFR 60.46b(e)(4), following the date on which the initial performance test is completed, the permittee shall upon request determine compliance with the NO<sub>x</sub> standards in §60.44b through the use of a 30-day performance test for the Nebraska boiler. During periods when performance tests are not requested, NO<sub>x</sub> emissions data collected pursuant to §60.48b(g)(1) or §60.48b(g)(2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the NO<sub>x</sub> emission standards.

A new 30-day rolling average emission rate is calculated each operating day as the average of all of the hourly NO<sub>x</sub> emission data for the preceding 30 Nebraska boiler operating days.

[40 CFR 60.46b(e)]

### 4.15 Rentech Boiler Maximum Heat Input Capacity

In accordance with 40 CFR 60.46b(g), the permittee shall demonstrate the maximum heat input capacity of the Rentech boiler by operating the facility at maximum capacity for 24 hours. The owner or operator of an affected facility shall determine the maximum heat input capacity using the heat loss method or the heat input method described in sections 5 and 7.3 of the ASME *Power Test Codes* 4.1.

[40 CFR 60.46b(g)]

## Reporting Requirements

### 4.16 Rentech Boiler Performance Test and CEMS Data

In accordance with 40 CFR 60.49b(b), the permittee shall submit the performance test data from the initial performance test on the Rentech boiler, and the performance evaluation of the CEMS using the applicable performance specifications in appendix B of 40 CFR 60.49b, no later than 180 days from startup in accordance with §60.8.

[40 CFR 60.49b(b)]

#### **4.17 Nebraska Boiler and Rentech Boiler Excess Emissions Reporting**

In accordance with 40 CFR 60.49b(h), the permittee shall submit excess emission reports for any excess emissions that occurred during the reporting period for both the Nebraska boiler and the Rentech boiler. Excess emissions are defined as any calculated 30-day rolling average NO<sub>x</sub> emission rate, as determined under §60.46b(e), that exceeds the applicable emission limits in §60.44b.

[40 CFR 60.49b(h)]

#### **4.18 Nebraska Boiler and Rentech Boiler Emissions Reporting**

In accordance with 40 CFR 60.49b(i), the permittee shall submit reports containing the information recorded under Permit Condition 4.12. In accordance with 40 CFR 60.49b(v through w), the permittee shall submit required reports each 6 month period and shall be postmarked by the 30<sup>th</sup> day following the end of the reporting period.

[40 CFR 60.49b(i, v-w)]

### **Boiler MACT Requirements**

#### **4.19 Boiler Operations**

In accordance with §63.7500(a)(3), at all times the permittee must operate and maintain any affected source (as defined in §63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to DEQ that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.7500(a)(3)]

#### **4.20 Work Practice Standard**

In accordance with §63.7515(d), if the permittee is required to meet an applicable tune-up work practice standard, the permittee must conduct a 5 year performance tune-up according to §63.7540(a)(12). Each 5 year tune-up specified in §63.7540(a)(12) must be no more than 61 months after the previous tune-up.

[40 CFR 63.7515(d)]

#### **4.21 Performance Tune-Up Requirements**

In accordance with §63.7540(a)(12), the permittee must conduct a tune-up of the boilers every five (5) years to demonstrate continuous compliance as specified below. The permittee may delay the burner inspection specified in paragraph (a)(10)(i) of this section until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months.

- As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

- Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;
- Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject;
- Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- Maintain on-site and submit, if requested by DEQ, a report containing the information below:
  - The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater; and
  - A description of any corrective actions taken as a part of the tune-up.

[40 CFR 63.7540(a)(12)]

#### 4.22 Tune-Up Schedule

In accordance with §63.7540(a)(13), if the boiler is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.

[40 CFR 63.7540(a)(13)]

#### 4.23 Reporting

In accordance with §63.7550(b), for units that are subject only to a requirement to conduct a 5-year tune-up according to §63.7540(a)(12), and not subject to emission limits or operating limits, the permittee may submit only a 5-year compliance report, as applicable, as specified in paragraphs (b)(3) and (4) of this condition, instead of a semi-annual compliance report.

- Each subsequent 5-year compliance reports must cover the applicable 5-year periods from January 1 to December 31.
- 5-year compliance reports must be postmarked or submitted no later than January 31.

[40 CFR 63.7550(b)]

#### 4.24 Compliance Reports

In accordance with §63.7550(c), if the facility is subject to the requirements of a tune up they must submit a compliance report with the information in paragraphs (c)(5)(i) through (iii) and (xiv) and (xvii) of this condition.

- (i) Company and Facility name and address.
- (ii) Process unit information, emissions limitations, and operating parameter limitations.
- (iii) Date of report and beginning and ending dates of the reporting period.

xiv) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct a 5-year tune-up according to §63.7540(a)(12). Include the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.

(xvii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.

[40 CFR 63.7550(c)]

#### 4.25 CEDRI Submissions

In accordance with §63.7550(h)(3), the permittee must submit all reports required by Table 9 of Subpart DDDDD electronically via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the permittee must submit the report to DEQ and EPA at the appropriate address listed in §63.13. The permittee must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.

[40 CFR 63.7550(h)(3)]

#### 4.26 Notifications and Reports

In accordance with §63.7555(a), the permittee shall keep a copy of each notification and report that the permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or 5-year compliance report that the permittee submitted, according to the requirements in §63.10(b)(2)(xiv).

[40 CFR 63.7555(a)]

#### 4.27 Records

In accordance with §63.7560, the permittee shall comply with the following:

- The permittee's records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1).
- As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
- The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee can keep the records off site for the remaining 3 years.

[40 CFR 63.7560]

## 5 Pulp Dryers

### Summary Description

This section provides a summary description of the pulp dryers and has been provided for informational purposes.

The direct-fired pulp dryers are used to dry pressed beet pulp. The dryers are primarily coal-fired, but can also be fired by natural gas. Exhaust gases from each dryer are split into two streams. Each stream is split and passes through two cyclones that operate in parallel. Exhaust from the cyclones is combined and then split between two spray impingement-type scrubbers that also operate in parallel.

Table 5.1 describes the devices used to control emissions from the pulp dryers.

**Table 5.1 Pulp Dryers Description**

Emissions Units / Processes	Control Devices
North Pulp Dryer (S-D2)	Dryer exhaust is split between two cyclones (A-D2A) that operate in parallel. Cyclone exhaust is combined and then split between two Spray-Impingement Scrubbers (A-D2B) that operate in parallel.
South Pulp Dryer (S-D1)	Dryer exhaust is split between two cyclones (A-D1A) that operate in parallel. Cyclone exhaust is combined and then split between two Spray-Impingement Scrubbers (A-D1B) that operate in parallel.

Table 5.2 contains only a summary of the requirements that apply to the pulp dryers. Specific permit requirements are listed below.

**Table 5.2 Applicable Requirements Summary**

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
3.12	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.13 – 3.14, 3.32, 3.38
5.1	PM (water flow rate, pressure drop, total solids)	$E = 0.02518(PW)^{0.67}$ (for $PW < 60,000$ ) $E = 23.84(PW)^{0.11} - 40$ (for $PW \geq 60,000$ )	IDAPA 58.01.01.703 40 CFR 64	5.2, 8.2 – 8.13, 3.32, 3.38
3.28 – 3.31	Operation and Maintenance	Compliance with O&M requirements	P-2010.0043, IDAPA 58.01.01.322	3.29 – 3.31, 3.32, 3.38
5.3	Performance Testing	Once every 5 years	IDAPA 58.01.01.322	5.3, 3.33 – 3.37, 3.32, 3.38

## Emission Limits

### 5.1 Emissions Limits

The permittee shall not emit PM to the atmosphere from any equipment used exclusively to dehydrate sugar beet pulp in excess of the amount shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight rate in pounds per hour. The averaging period for this limit is one hour in accordance with IDAPA 58.01.01.700.03.

- The North Pulp Dryer and South Pulp Dryer are each process equipment as defined in IDAPA 58.01.01.006.
- If PW is less than 60,000 lb/hr,  
 $E = 0.02518(PW)^{0.67}$
- If PW is greater than or equal to 60,000 lb/hr,
- $E = 23.84(PW)^{0.11} - 40$

[IDAPA 58.01.01.703, 4/5/2000]

## Monitoring and Recordkeeping Requirements

### 5.2 Process Weight Input Rate Monitoring

The permittee shall record the process weight input rate to each of the Pulp Dryers monthly. It shall be calculated in accordance with procedures approved by DEQ.

[IDAPA 58.01.01.322.06-07, 5/1/1994]

## Performance Testing Requirements

### 5.3 Coal-Firing Compliance Test

A compliance test shall be conducted on each of the Pulp Dryers at least once every 5 years to demonstrate compliance with Permit Condition 5.1. Testing shall be conducted and results reported in accordance with IDAPA 58.01.01.157 and the performance testing facility-wide permit conditions (Permit Conditions 3.33 through 3.37) and records shall be maintained in accordance with the monitoring and recordkeeping permit condition (Permit Condition 3.32).

- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157. Test methods and procedures shall comply with IDAPA 58.01.01.157.
- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the coal feed rate to the Pulp Dryers in tons per hour, pressure drop across the scrubbers (A–D2B, A–D1B), and water flow rate to the scrubbers (A–D2B, A–D1B) during each test.
- For each of the Pulp Dryers, the process weight input (tons per hour) shall be calculated using a DEQ approved methodology. Parameters and operating data used to calculate the process weight input must also be recorded for each compliance test run. These parameters and operating data include total dried pulp produced (tons per day), dried pulp moisture content (percent by weight), pressed pulp moisture content (percent by weight),

fuel heating value (Btu/lb), fuel input per ton of dried pulp (therms per ton), quantity of additives (percent of dry substance per ton of dry pulp), solids content of the additives, and throughput to each dryer (percent).

- For the coal used during the source test, the permittee shall record the high heating value and analysis results, including ash content.
- The permittee shall collect a representative sample of water from the scrubbers (A–D2B, A–D1B) during each test. The concentration of total dissolved solids and suspended solids in the sample water shall be analyzed and recorded, and expressed in milligrams of solids per liter of water.

**[IDAPA 58.01.01.322.06-09, 5/1/1994]**

## 6 Pellet Coolers

### Summary Description

This section provides a summary description of the pellet coolers and has been provided for informational purposes.

The emissions from the three pellet coolers are controlled by two cyclones.

Table 6.1 describes the devices used to control emissions from the pellet coolers.

**Table 6.1 Emissions Unit Name Description**

Emissions Units / Processes	Control Devices
Pellet Cooler No. 1 (S–D3)	Cyclone (A–D3)
Pellet Cooler No. 2 (S–D4)	Cyclone (A–D4/5)
Pellet Cooler No. 3 (S–D5)	

Table 6.2 contains only a summary of the requirements that apply to the pellet coolers. Specific permit requirements are listed below.

**Table 6.2 Applicable Requirements Summary**

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
3.12	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.13 – 3.14, 3.32, 3.38
6.1	PM	$E = 0.045(PW)^{0.60}$ (for $PW < 17,000$ )  $E = 1.12(PW)^{0.27}$ (for $PW \geq 17,000$ )	IDAPA 58.01.01.702	6.2, 3.32, 3.38
3.28 – 3.31	Operation and Maintenance	Compliance with O&M requirements	IDAPA 58.01.01.322	3.29 – 3.31, 3.32, 3.38

### Emission Limits

#### 6.1 Emissions Limits

The permittee shall not emit PM into the atmosphere from any process or process equipment operating prior to October 1, 1979, in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- Pellet Cooler No. 1, Pellet Cooler No. 2, and Pellet Cooler No. 3 are each process equipment as defined in IDAPA 58.01.01.006.
- If PW is less than 17,000 lb/hr,  
 $E = 0.045(PW)^{0.60}$
- If PW is equal to or greater than 17,000 lb/hr,
- $E = 1.12(PW)^{0.27}$

[IDAPA 58.01.01.702, 4/5/2000]

## **Monitoring and Recordkeeping Requirements**

### **6.2 Cyclone Inspection**

At least once each year during a planned maintenance outage, or as needed during operation, each cyclone shall be inspected for physical degradation that could affect the performance of the cyclone. The permittee shall make all necessary repairs to the cyclone(s) to ensure efficient operation.

**[IDAPA 58.01.01.322.06, 5/1/1994]**

# 7 Lime Kiln System

## Summary Description

This section provides a summary description of the lime kiln and has been provided for informational purposes.

The lime kiln produces calcium oxide (CaO) and concentrated carbon dioxide (CO<sub>2</sub>) gas for juice purification. The CaO from the kiln is transferred to Slaker No. 1 (S-K2) to produce milk of lime. The CO<sub>2</sub> gas from the kiln passes through a two-stage high efficiency scrubbing system (A-K1). The gas washer scrubs and cools the exhaust gas prior to the compressors. The compressors convey the CO<sub>2</sub> gas to the first and second carbonation tanks in parallel. The gas is bubbled through the juice from the bottom of the carbonation tanks.

Table 7.1 describes the devices used to control emissions from the kiln.

**Table 7.1 Lime Kiln System Description**

Emissions Units / Processes	Control Devices
Lime Kiln (S-K1)	Gas Washer First Carbonation Tank Second Carbonation Tank (A-K1)

Table 7.2 contains only a summary of the requirements that apply to the lime kiln system. Specific permit requirements are listed below.

**Table 7.2 Applicable Requirements Summary**

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
7.2, 3.12	Visible emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.13 – 3.14, 3.32, 3.38
7.1	PM	<u>First carbonation tank</u> PM <sub>10</sub> ≤ 2.42 lb/hr	P-2010.0043	7.5 – 7.13, 3.32, 3.38
		<u>Second carbonation tank</u> PM <sub>10</sub> ≤ 0.46 lb/hr		
7.3		<u>Pressure relief vent</u> PM <sub>10</sub> ≤ 0.46 lb/hr E = 0.045(PW) <sup>0.60</sup> (for PW < 9,250) E = 1.10(PW) <sup>0.25</sup> (for PW ≥ 9,250)	P-2010.0043 IDAPA 58.01.01.701	
7.1	NO <sub>x</sub>	20.21 lb/hr	P-2010.0043 IDAPA 58.01.01.322	7.7 – 7.8, 7.11 – 7.13, 3.29 – 3.31, 3.32, 3.38
	CO	689.8 lb/hr		
	SO <sub>2</sub>	0.92 lb/hr		
7.5 – 7.6	(gas washer flow and pressure drop)			
7.4, 3.20 – 3.21	Sulfur Content	1% sulfur by weight for coal, as received	IDAPA 58.01.01.725 40 CFR 52.21	3.21, 3.32, 3.38
7.7	Lime rock input	770 T/day 146,300 T/yr	P-2010.0043 40 CFR 52.21	7.7, 7.11 – 7.12, 3.32, 3.38

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
7.8	Fuel Usage	55.2 T/day of coal and/or coke	P-2010.0043 40 CFR 52.21	7.8, 7.13, 3.32, 3.38
3.28 – 3.31	Operation and Maintenance	Compliance with O&M requirements	IDAPA 58.01.01.322	3.29 – 3.31, 3.32, 3.38
7.14	Testing	3 years or 5 years depending on emission rate	P-2010.0043 IDAPA 58.01.01.322	7.14 – 7.16, 3.33 – 3.37, 3.32, 3.38

## Emission Limits

### 7.1 Emissions Limits

The emissions from the kiln stacks shall not exceed any corresponding emissions rate limits listed in Table 7.3.

**Table 7.3 Kiln Emission Limits** <sup>(a)</sup>

Emission Points	PM <sub>10</sub> <sup>(b)</sup>	SO <sub>2</sub>	NO <sub>x</sub>	CO
	lb/hr <sup>(c)</sup>	lb/hr <sup>(c)</sup>	lb/hr <sup>(c)</sup>	lb/hr <sup>(c)</sup>
First carbonation tank	2.42			
Second carbonation tank	0.46			
Pressure relief vents	0.46			
<b>Kiln, total</b> <sup>(d)</sup>	<b>2.88</b>	<b>0.92</b>	<b>20.21</b>	<b>689.8</b>

- In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- Total emissions from the first carbonation tank, the second carbonation tank, pressure relief valve(s), and the gas washer combined.

[PTC No. P-2010.0043, 3/18/2014]

### 7.2 Opacity Limit

Emissions from the First Carbonation Tank, the Second Carbonation Tank, the compressor Pressure relief vent, the process slaker, or any other stack, vent, or functionally equivalent opening associated with the kiln, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[PTC No. P-2010.0043, 3/18/14; IDAPA 58.01.01.625, 5/8/2009]

### 7.3 PM Limit

The permittee shall not emit PM into the atmosphere from any process or process equipment in excess of the amount shown by the equations in IDAPA 58.01.01.700-703, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

The kiln is process or process equipment as defined in IDAPA 58.01.01.006.

- If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[PTC No. P-2010.0043, 3/18/14; IDAPA 58.01.01.701, 4/5/2000]

## Operating Requirements

### 7.4 Fuel Limits

The kiln shall combust only anthracite coal and/or coke that meets the following specifications:

- The sulfur content of coal combusted shall not exceed 1.0% by weight on an as received basis.
- The sulfur content of coke combusted shall not exceed 1.0% by weight on an as received basis.

[PTC No. P-2010.0043, 3/18/14; 40 CFR 52.21]

### 7.5 Water Flow Rate

The permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the water flow rate to the gas washer. The permittee shall maintain the water flow rate to the gas washer at greater than or equal to the value specified in the O&M manual (Permit Condition 3.30).

[PTC No. P-2010.0043, 3/18/2014]

### 7.6 Pressure Drop

The permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the pressure drop across the gas washer. The permittee shall maintain the pressure drop across the gas washer at greater than or equal to the value specified in the O&M manual (Permit Condition 3.30).

[PTC No. P-2010.0043, 3/18/2014]

### 7.7 Lime Rock Input Rate

The permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the lime rock input to the kiln.

- The lime rock input to the kiln shall not exceed 770 tons per day, based on a five day rolling average.
- The lime rock input to the kiln shall not exceed 146,300 tons per any consecutive 12 calendar month period.

[PTC No. P-2010.0043, 3/18/14; 40 CFR 52.21]

### 7.8 Fuel Input Rate

The permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the fuel input to the kiln. The fuel usage (anthracite coal and/or coke combined) for the kiln shall not exceed 55.2 tons per day, based on a five-day rolling average.

[PTC No. P-2010.0043, 3/18/14; 40 CFR 52.21]

## Monitoring and Recordkeeping Requirements

### 7.9 Water Flow Rate

When the kiln is operated, the permittee shall continuously monitor and record on a daily basis the water flow rate to the gas washer to ensure compliance with the gas washer flow rate specified in the O&M manual (Permit Condition 3.30).

[PTC No. P-2010.0043, 3/18/2014]

### **7.10 Pressure Drop**

When the kiln is operated, the permittee shall continuously monitor and record on a daily basis the pressure drop across the gas washer to ensure compliance with the gas washer pressure drop specified in the O&M manual (Permit Condition 3.30).

[PTC No. P-2010.0043, 3/18/2014]

### **7.11 Daily Lime Rock Input**

When the kiln is operated, the permittee shall monitor continuously and record on a daily basis the lime rock input to the kiln in tons per calendar day and the lime rock input to the kiln in tons per rolling 5-day average to demonstrate compliance with the kiln daily throughput limit (Permit Condition 7.7). The 5-day rolling average lime rock input to the kiln shall be calculated each calendar day as the arithmetic average of the lime rock input to the kiln measured for the given calendar day and the four calendar days immediately preceding that day.

[PTC No. P-2010.0043, 3/18/2014]

### **7.12 Monthly Lime Rock Input**

The permittee shall record on a monthly basis the lime rock input to the kiln in tons per calendar month and in tons per consecutive 12 calendar month period to demonstrate compliance with the kiln annual throughput limit (Permit Condition 7.7). The 12-calendar month rolling average lime rock input to the kiln shall be calculated each calendar month as the arithmetic average of the lime rock input to the kiln measured for the given calendar month and the eleven calendar months immediately preceding that month.

[PTC No. P-2010.0043, 3/18/2014]

### **7.13 Fuel Input**

When the kiln is operated, the permittee shall monitor continuously and record on a daily basis the amount of fuel input to the kiln in tons per calendar day and the amount of fuel input to the kiln in tons per rolling 5-day average to demonstrate compliance with the kiln fuel usage limit (Permit Condition 7.8). The 5-day rolling average fuel usage shall be calculated each calendar day as the arithmetic average of the fuel input to the kiln measured for the given calendar day and the four calendar days immediately preceding that day.

[PTC No. P-2010.0043, 3/18/2014]

## **Performance Testing Requirements**

### **7.14 Kiln Emission Points Performance Test**

Performance testing shall be conducted on the kiln emission points according to the following schedule, to demonstrate compliance with the CO, NO<sub>x</sub>, and visible emission limits (Permit Conditions 7.1, 7.2, and 3.12), in accordance with IDAPA 58.01.01.211, IDAPA 58.01.01.157, and the performance testing general provisions (Permit Conditions 3.33 through 3.37):

- If the pollutant emission rate measured in the most recent test is less than or equal to 50% of the emission standard (Permit Condition 7.1), the next test shall be conducted within five years of the test date.
- If the pollutant emission rate measured during the most recent performance test is greater than 50% of the emission standard (Permit Condition 7.1), the next test shall be conducted within three years of the test date.
- Visible emission testing (Permit Conditions 7.2, 3.12) shall be conducted on the same date that any other pollutant testing is required by this permit condition.

[PTC No. P-2010.0043, 3/18/2014]

### **7.15 Performance Testing Conditions**

Each performance test shall be conducted in accordance with IDAPA 58.01.01.157, the performance testing general provisions (Permit Conditions 3.33–3.37), the test methods requirement (Permit Condition 3.36), and under the following operating conditions, unless otherwise approved by DEQ:

- Visible emissions shall be measured at the first carbonation tank, second carbonation tank, and pressure relief vents.
- CO and NO<sub>x</sub> emissions shall be measured at the first carbonation tank and the second carbonation tank.
- The kiln shall be operated at maximum capacity (at least 80% of the maximum rated equipment throughput or greater) during the source test period unless otherwise approved by DEQ.
- Parameters shall be monitored and recorded as specified in the performance test monitoring requirement (Permit Condition 7.16).
- If the pressure relief valves are open during the tests, the excess gas shall be ducted to the first carbonation tank during the test so emissions from the pressure relief vents are included in the first carbonation tank emissions.

[PTC No. P-2010.0043, 3/18/2014]

### **7.16 Monitoring During Performance Tests**

The permittee shall monitor and record the following operating conditions for the kiln during each performance test, unless otherwise approved by DEQ:

- The amount of coal combusted in the kiln, in tons per test and average tons per hour (T/hr);
- The amount of coke combusted in the kiln, in tons per test and average tons per hour (T/hr);
- The amount of lime rock processed in the kiln (throughput), in tons per test and average tons per hour (T/hr);
- The ash content and sulfur content of the coal fuel fired on a dry weight basis;
- The ash content and sulfur content of the coke fuel fired on a dry weight basis;
- The pressure drop across the gas washer in inches water gauge (iwg), at least once every 20 minutes;
- The gas washer water flow rate in gallons per minute (gpm), at least once every 20 minutes;
- Whether the pressure relief valve was open (venting) at any time during each test, or closed for the duration of each test.
- The permittee shall furnish DEQ a written report of the results of each performance test, in accordance with IDAPA 58.01.01.157 and the performance testing facility wide condition (Permit Condition 3.37).

[PTC No. P-2010.0043, 3/18/2014]

# 8 40 CFR 64 – Compliance Assurance Monitoring

## Summary Description

**8.1** The purpose of this section of the permit is to include all of the applicable requirements of 40 CFR 64, “Compliance Assurance Monitoring” (CAM). CAM requires selecting compliance indicators that when operated within specified ranges provide a reasonable assurance of compliance. CAM also requires monitoring, record keeping, and reporting requirements.

**8.2** Table 8.1 lists the emissions units and pollutants that are applicable to CAM and details the monitoring requirements for each emissions unit which the permittee shall comply with. The table also specifies the specific values that are approved to determine when an excursion has occurred.

- Emissions Unit: North and South Pulp Dryer Scrubbers
- Regulated Pollutant: PM

**Table 8.1 Compliance Assurance Monitoring Requirements for North and South Pulp Dryer Scrubbers <sup>(a)</sup>**

Requirement	Indicator No. 1	Indicator No. 2	Indicator No. 3
Indicator	Scrubber Water Flow Rate	Scrubber Differential Pressure	Inspection and Maintenance of Scrubbers
Measurement Approach	The water flow rate is monitored with insertion type magnetic flow meters.	The differential pressure in the scrubbers is measured by a differential pressure sensor and transmitter. The monitor compares pressure before and after the scrubber and transmits the value to the control room.	Physical degradation of the scrubbers or mechanical components could affect the performance.
Indicator Range	An excursion <sup>a</sup> is defined as a scrubber water flow of less than 100 gpm and greater than 400 gpm.	An excursion <sup>a</sup> is defined as a pressure drop of less than 4.0 inches of water.	---
Performance Criteria Data Representativeness	The magnetic water flow meters are located on the pipeline between the scrubber water pumps and the two scrubbers.	Measure pressure differential before and after each scrubber.	---
QA/QC Practices	The flow meters were installed in accordance with the manufacturer’s recommendations. The flow meters are removed, cleaned, and inspected annually. Operation is checked during the test-out before the beet run.	The pressure sensors and transmitters were installed in accordance with the manufacturer’s recommendations. The pressure sensors and transmitters are inspected and calibrated annually.	Annual inspection and maintenance in accordance with the O&M manual.
Monitoring Frequency	The scrubber water flow is monitored continuously.	The pressure drop across the scrubbers is measured continuously.	The scrubbers are inspected annually during a planned maintenance downtime.
Data Collection Procedure	The scrubber flow rates are recorded every 15 minutes and stored in Parview.	The scrubber differential pressure values are recorded every 15 minutes and stored in Parview.	Inspection and maintenance is checked and recorded.
Averaging Period	Daily average	Daily average	---

a) Excursion is defined in 40 CFR 64 as a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.

## CAM Recordkeeping

**8.3** In accordance with 40 CFR 64.7(a), the permittee shall conduct the monitoring required under this permit upon issuance.

[40 CFR 64.7(a)]

**8.4** In accordance with 40 CFR 64.7(b), at all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[40 CFR 64.7(b)]

- 8.5** In accordance with 40 CFR 64.7(c)-except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments)-the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the North and South Pulp Dryer Scrubbers are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of CAM, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- [40 CFR 64.7(c)]**
- 8.6** In accordance with 40 CFR 64.7(d), upon detecting an excursion or exceedance, the permittee shall restore operation of the emissions unit(s) (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- [40 CFR 64.7(d)]**
- 8.7** In accordance with 40 CFR 63(b), for the description of the control device(s) (e.g., cyclone separator in series with a wet scrubber), if the manufacturer specifications for the monitoring devices for indicator 1 (e.g., pressure drop) and indicator 2 (e.g., scrubbing media flow rate) include calibration procedures but do not specify a calibration frequency, the device shall be calibrated at least once each calendar year.
- [40 CFR 64.3(b)(1), (2), and (3)]**
- 8.8** In accordance with 40 CFR 64.6(c)(2), an excursion shall be defined as any measured monitoring parameter which is outside the indicator ranges specified for the emissions unit in Table 8.1.
- [40 CFR 64.6(c)(2)]**
- 8.9** In accordance with 40 CFR 64.7(e), if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this operating permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- [40 CFR 64.7(e)]**

- 8.10** In accordance with 40 CFR 64.8(a), the permittee shall develop and implement a quality improvement plan (QIP) if an accumulation of exceedances or excursions exceeds 5 percent duration of North and South Pulp Dryer Scrubbers' operating time for a reporting period.  
[40 CFR 64.8(a)]
- 8.11** In accordance with 40 CFR 64.9(a)(2), the reports required by the Semiannual Monitoring Reports and Reporting Deviations and Excess Emissions General Provisions shall include the following information for those emissions units listed in Table 8.1.
- Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken.
  - Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).
- [40 CFR 64.9(a)(2)]
- 8.12** In accordance with 40 CFR 64.9(b), the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring or records of monitoring maintenance or corrective actions).  
[40 CFR 64.9(b)]
- 8.13** Should there be a conflict between 40 CFR 64 and any of Permit Conditions 8.1 through 8.4 or 8.7 through 8.10 of this permit, the 40 CFR 64 shall govern.

## 9 Insignificant Activities

- 9.1 Table 9.1 lists the units or activities that are insignificant on the basis of size or production rate as provided by the permittee. The regulatory citation for units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b. There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities. No emission unit or activity subject to an applicable requirement shall qualify as an insignificant emission unit or activity.

**Table 9.1 Insignificant Activities**

Location	Emission Point / Source Identification	Description	Insignificant Activities IDAPA 58.01.01.317.01 Citation
Lime Kiln		Lime rock handling and coke and/or anthracite coal handling	(b)(i)5
		Slakers #1, #2, #3, and #4	(b)(i)30
Acid Tanks	220	Heater Boilout Mix Tank (Muriatic Acid), Vent	(b)(i)19
	221	Heater Boilout Mix Tank, Open Manway	(b)(i)19
	222	Muriatic Acid Tank Vent	(b)(i)19
	223	Vacuum Drum Filters Muriatic Acid Tank, Vent	(b)(i)19
	224	Heater Boilout Mix Tank (Caustic), Vent	(b)(i)19
	225	Heater Boilout Mix Tank (Caustic), Vent	(b)(i)19
	226	Aluminum Bisulphate Tank, Vent	(b)(i)19
	227	Caustic Tank, Vent	(b)(i)19
	228	Caustic Tank, Vent	(b)(i)19
	229	Caustic Tank, Vent	(b)(i)19
	230	Busan 1007 Tank, Vent	(b)(i)19
	231	Busan 1007 Tank, Vent	(b)(i)19
	232	BCC-315 Tank, Vent	(b)(i)19
	233	BCC-315 Tank, Vent	(b)(i)19
	234	BCC-315 Tank, Vent	(b)(i)19
	235	Sulfuric Acid Tank, Vent	(b)(i)19
236	Brine Tank, Vent	(b)(i)19	
Tare Lab	252	South Boiler, Stack	(b)(i)5
	255	North Boiler, Stack	(b)(i)5
	256	Brei Dust Fan, Exhaust	(b)(i)30
	257	Space Heater, Exhaust	(b)(i)18
Granulator System	S-W1	Granulator System	(b)(i)30
	S-W2	Cooling Granulator No. 1	(b)(i)30
	S-W3	Cooling Granulator No. 2	(b)(i)30
Sugar Handling System	SW-4	Process Sugar Handling System	(b)(i)30
	SW-5	Bulk Loadout Sugar Handling System	(b)(i)30

Location	Emission Point / Source Identification	Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Miscellaneous	Not applicable	Propane lances for heating rail cars	(b)(i)5
		Lime rock and coke handling from rail cars and storage piles into lime kiln building	(b)(i)30
		Sugar silos #1, #2, and #3	(b)(i)30
		Coke and anthracite unloading and storage pile	(b)(i)30
		Lime rock unloading and storage pile	(b)(i)30

[IDAPA 58.01.01.317.01(b)(i), 5/3/2003]

## **10 Non-Applicable Requirement Determinations**

### **10.1 Fuel-Burning Equipment Particulate Matter Standards**

The standards for fuel-burning equipment particulate matter, IDAPA 58.01.01.675, do not apply to the pulp dryers or to the Kiln under Sections 5 and 7 of this permit.

### **10.2 40 CFR 60, Subpart D**

Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D, do not apply to the B&W boiler or to the Erie City boiler under Section 4 of this permit.

[IDAPA 58.01.01.325.01.b, 5/1/1994]

# 11 General Provisions

## General Compliance

- 11.1** The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.  
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
- 11.2** It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.  
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
- 11.3** Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.  
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

## Reopening

- 11.4** This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.  
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]
- 11.5** The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

## Property Rights

- 11.6** This permit does not convey any property rights of any sort or any exclusive privilege.  
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

## Information Requests

- 11.7** The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.  
[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/2000; 40 CFR 70.6(a)(6)(v)]
- 11.8** Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.  
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

## Severability

- 11.9** 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.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

## Changes Requiring Permit Revision or Notice

- 11.10** The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200–223, 3/25/16; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380–386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15); 40 CFR 70.7(d), (e)]

- 11.11** Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the Clean Air Act (CAA), 42 United States Code (U.S.C.) Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381–385, 4/5/00; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14), (15)]

## Federal and State Enforceability

- 11.12** Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1), (2)]

- 11.13** Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/1998]

## Inspection and Entry

- 11.14** Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where a Tier I source is located, or emissions related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

- 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; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

## **New Applicable Requirements**

**11.15** The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/1994;  
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

## **Fees**

**11.16** The permittee shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

## **Certification**

**11.17** All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

## **Renewal**

**11.18** The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the permittee is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

**11.19** If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit, including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325, shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

## **Permit Shield**

**11.20** Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to

construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).

- Nothing in this permit shall alter or affect the following:
  - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
  - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 5/1/1994; IDAPA 58.01.01.325, 3/19/1999; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/1999; 40 CFR 70.6(f)]

## Compliance Schedule and Progress Reports

**11.21** The permittee shall comply with the following:

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3) and (4)]

## Periodic Compliance Certification

**11.22** The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:

- The compliance certifications for all emissions units shall be submitted annually from October 1 to September 30 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
- The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit, including emissions limitations, standards, and work practices;
- The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
  - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
  - The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the

certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;

- The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- Such information as DEQ may require to determine the compliance status of the emissions unit.

**11.23** All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/2005; 40 CFR 70.6(c)(5)(iii) as amended,  
62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

### **False Statements**

**11.24** 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, 3/23/1998]

### **No Tampering**

**11.25** 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, 3/23/1998]

### **Semiannual Monitoring Reports**

**11.26** In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from October 1 to March 31 and April 1 to September 30. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/1998; IDAPA 58.01.01.322.08.c, 4/5/2000; 40 CFR 70.6(a)(3)(iii)]

### **Reporting Deviations and Excess Emissions**

**11.27** The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130–136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q, 3/23/1998; IDAPA 58.01.01.135, 4/11/2006; 40 CFR 70.6(a)(3)(iii)]

## **Permit Revision Not Required**

**11.28** No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/2000; 40 CFR 70.6(a)(8)]

## **Emergency**

**11.29** In accordance with IDAPA 58.01.01.332, an “emergency”, as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/2000; 40 CFR 70.6(g)]