

# **Statement of Basis**

**Tier I Operating Permit No. T1-2012.0060**

**Project ID 61109**

**Idaho Forest Group - Grangeville  
Grangeville, Idaho**

**Facility ID 049-00003**

**Final**

**July 29 2013**

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**Permit Writer**



The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

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**APPENDIX A - EMISSIONS INVENTORY**

**APPENDIX B - FACILITY COMMENTS FOR DRAFT PERMIT**

## 1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

Bldg	building
Btu	British thermal unit
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CI	compression ignition
CO <sub>2</sub> e	CO <sub>2</sub> equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HHV	higher heating value
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
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
PC	permit condition
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
T/yr	tons per consecutive 12 calendar month period
T1	Tier I operating permit
TAP	toxic air pollutants
VOC	volatile organic compound

## 2. INTRODUCTION AND APPLICABILITY

Idaho Forest Group LLC is a producer of dimensional lumber products, and is located at outside of Grangeville, Idaho. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit PM<sub>10</sub> above the major source threshold of 100 tons-per-year and has the potential to emit over 100,000 tons per year of CO<sub>2</sub> equivalent of greenhouse gas pollutants. The facility is not classified as a major facility, as defined by Subsection 008.10.a, because it does not emit or has the potential to emit HAP pollutants above the major source thresholds of 10 tons-per-year for any single HAP and/or 25 tons-per-year for any combination of HAP.

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for Idaho Forest Group LLC –Grangeville.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

Idaho Forest Group LLC's Tier I operating permit is organized into sections. They are as follows:

### **Section 1 - Tier I Operating Permit Scope**

The scope describes this permitting action.

### **Section 2 - Facility-Wide Conditions**

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

### **Sections 3 through 8 – Wellons boiler, Production equipment, and Fire pump engine.**

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

### **Section 7 – Compliance Assurance Monitoring**

A CAM schedule will be in the permit to address any compliance assurance monitoring parameters regarding the Wellons boiler and control equipment.

### **Section 8 - Non-applicable Requirements and Insignificant Activities**

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

### **Section 9 - General Provisions**

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement.

Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

### **3. FACILITY INFORMATION**

#### **3.1 Facility Description**

The Idaho Forest Group Grangeville facility is a lumber processing saw and planer mill with a state of the art sawmill, minimizing wood waste. Except for the log deck, the entire sawmill process is enclosed in a large building and annex. The sawmill includes conveyor systems that bring incoming timber through preliminary processes into the mill. All wood by-products are contained where generated, and transported with minimal loss to processes to separate out saleable products including bark, wood chips, sawdust, hog fuel, and fines. Material is also transported, with minimal loss, and processed as necessary to efficiently fuel the onsite hog-fuel boiler. The cut lumber is dried and planed onsite then prepared for final delivery and trucked offsite.

The facility's emission units, as defined in IDAP 58.01.01.006.35 and Permit TI-2008.0203, are the biomass-fired boiler, 5 lumber dry kilns, six cyclones, and two baghouses.

#### **3.2 Facility Permitting History**

##### Tier I Operating Permit History - Previous 5-year permit term March 20, 2008 to March 20, 2013

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from to March 20, 2008. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

February 17, 2009 T1-2008.0203, change the facility name and contact person, Permit status S when project no. 61109 is issued

March 20, 2008 T1-2007.0061, initial Tier I operating permit, Permit status or (S)

##### Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

February 16, 2009 PTC No. P-2008.0204 for changes to the facility name and facility contact(A)

July 20, 2006 Modified PTC No. P-05214 for new equipment installation and production increase issued July 10, 2006 (S),

July 29, 2005 Initial PTC No. P-040214 issued July 29, 2005 (S)

### **4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY**

#### **4.1 Application Scope**

This permit is the renewal of the facility's currently effective Tier I operating permit. The facility requested two sources to be added to the insignificant activities list. These sources are the flare chipper and cyclone 75. The fuel for the hog fuel boiler was changed from wood or waste wood to biomass.

#### **4.2 Application Chronology**

September 21, 2012 DEQ received an application.

November 19, 2012 DEQ determined that the application was complete.

January 19, 2013 DEQ made available the draft permit and statement of basis for peer and regional office review.

January 19, 2013	DEQ made available the draft permit and statement of basis for applicant review.
February 15, 2013	DEQ received facility's comments on the first draft permit and statement of basis.
March 19, 2013	DEQ sent facility a second draft of the permit and statement of basis.
March 27, 2013	DEQ received the facility comments of the second draft permit and statement of basis.
June 18, 2013	DEQ provided the proposed permit and statement basis for EPA review.
July 29, 2013	DEQ issued the final permit and statement of basis.

## 5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

### 5.1 Process No. 1 – Wellons Boiler

Table 5.1 lists the emissions units and control devices associated with hog fuel boiler.

**Table 5.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit Description	Control Device (if applicable)	Emission Point
Hog fuel boiler	Multiclone and ESP	Boiler stack

The Wood Fired Boiler on site burns only biomass, very near 100% is hog fuel. During startup operations or critical maintenance operations, sometimes other residual products such as wood chips or sawdust may be used. The Boiler produces steam that is piped to the dry kilns to dry the green lumber, and a small percentage of steam is used to heat the sawmill during the colder months of the year. The Boiler is equipped with a Multiclone and ESP to separate out particulate matter.

### 5.2 Process No. 2 – Kilns and Cyclones

Table 5.2 lists the emissions units and control devices associated with process equipment.

**Table 5.2 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Three Moore dry kilns	None	Multiple vents
Two Wellons dry kilns	None	Multiple vents
Cyclone 11 – Sawmill sawdust	<u>Baghouse</u> Manufacturer: Clarke Sheet Metal Model No.: CSM 60-20	Baghouse exhaust
Cyclone 72 Planer Shavings	<u>Baghouse</u> Manufacturer: Clarke Sheet Metal Model No.: 100-20G1	Baghouse exhaust

Log trucks deliver approximately 120 MMbf (log scale) of logs per year to the facility, where they are unloaded from the trucks and stored in the log yard. Rolling stock equipment is used to move the logs from the log yard to the an elevated conveyor system at the sawmill annex, where they are run through a debarker and merchandizer saws, which cut the logs to desired lengths. The bark and sawdust from the debarker and the merchandizer saws, referred to as "residual wood products," fall onto the residual line

conveyor and are removed from the sawmill annex and transported to the Hog, while the sized logs are sent to the sawmill.

Inside the sawmill, logs are sawed into dimensional lumber. Residual wood products from sawing operations fall onto a conveyor system that connects to the residual line conveyor. Dust collection systems in the sawmill use cyclones and a baghouse to separate fines from chips and send them to truck bins, from which they are shipped offsite as a saleable product.

The residual line conveyors transports residual wood products from the sawmill and the sawmill annex to boiler fuel system, where it is combined with a small volume of residual wood –products from the log yard. Other lesser-value residual wood products are routed directly to the boiler fuel silo by conveyors, and a hog is used to reduce the size of the larger residual wood products. The output of the hog conveys material to the boiler fuel silo. Fuel is moved by conveyor from the fuel silo to the boiler. If not needed for boiler operation, the boiler fuel can be routed to hog fuel storage for sale.

Cut lumber from the sawmill is stacked and sent to the kilns for drying. The chips, shavings, and sawdust from planing operations are collected and routed through the air system through cyclones and baghouses, which separates the material into chips, shavings, and fines. The chips are routed pneumatically to the chip truck bin, the shavings are taken pneumatically to the Rosebud Building, and the fines are pneumatically transported to the fines truck bin. The shavings in the Rosebud Building are processed into a trademarked product, Rosebud Horse Bedding. The exhaust from the planer cyclone is routed through a baghouse.

Ash and a small amount of yard or process residual wood product not suitable as boiler fuel are transported to the Wood Debris Management Area, where they are covered with soil. The ash is covered by a larger volume of soil material containing gravel and wood by-products generated by management of the log yard.

### Process No. 3 – Fire Pump Engine

Table 5.3 lists the emissions units and control devices associated with fire pump engine.

**Table 5.3 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Fire pump engine Manufacturer: Cummins Model: N-855-F Year of Manufacture: 1974 Output (hp): 218 Fuel: Diesel	None	Engine exhaust pipe

The fire pump engine is classified as an existing stationary engine under 300 hp located at an area source of HAP and must comply with the applicable requirements of 40 CFR 63 Subpart ZZZZ as they apply.

### 5.3 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 5.4 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

**Table 5.4 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION**

Emissions Unit / Activity	Regulatory Authority / Justification
Boiler relief valve(s)	IDAPA 58.01.01.317.01.a.1.77

Emissions Unit / Activity	Regulatory Authority / Justification
Boiler blowdown	IDAPA 58.01.01.317.01.a.i.1,2
All facility fuel and volatile storage and transfer operations	IDAPA 58.01.01.317.01.b.i.1,2
Any onsite welding	IDAPA 58.01.01.317.01.b.i.9
Painting and coating operations	IDAPA 58.01.01.317.01.b.i.17,25
Kerosene, natural gas, or propane space heaters under 5 MMBtu/hr	IDAPA 58.01.01.317.01.b.i.18
Parts cleaning	IDAPA 58.01.01.317.01.b.i.26
All other facility fugitive emission sources, including: facility vehicle traffic, sawing, conveyors, transfer sources, storage sources, debarking, screening, hog, log watering system, and associated sources	IDAPA 58.01.01.317.01b.i.30
Emergency diesel generator	IDAPA 58.01.01.317.01.b.i.30
Cyclone CY75	IDAPA 58.01.01.317.01.b.i.30
Flare Chipper	IDAPA 58.01.01.317.01.b.i.30

#### 5.4 Non-applicable Requirements for Which a Permit Shield is Requested

This section of the permit lists the regulations for which the facility has requested, and DEQ proposes to grant, a permit shield pursuant to IDAPA 58.01.01.325. The findings on which this shield is based are presented below:

No Permit Shield was requested, thus no Permit Shield was granted.

#### 5.5 Emissions Inventory

Table 5.5 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

Listed below Table 5.5 are the references for the emission factors used to estimate the emissions. The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix B of this statement of basis.

Table 5.5 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)

Source Description	PM <sub>10</sub> T/yr	NO <sub>x</sub> T/yr	SO <sub>2</sub> T/yr	CO T/yr	VOC T/yr	Lead T/yr	HAP T/yr	GHG CO <sub>2</sub> e T/yr
Boiler	29	127	13	101	25	0.02	19	107,000
Cyclone 11	0.04	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Cyclone 72	0.04	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Other cyclones combined	4.69	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Kilns	6	N/A	N/A	N/A	175	N/A	17.4	N/A
<b>Total Emissions</b>	<b>39.77</b>	<b>127</b>	<b>13</b>	<b>101</b>	<b>200</b>	<b>0.02</b>	<b>36.4</b>	<b>107,000</b>

Discussions with IDEQ permitting engineers and permitting managers during PTC application preparation and IDEQ's Statement of Basis (SOB) for existing facility PTC(s) verified that IDEQ concurs

that as long as transfers from conveyors are quantified as transfer emissions, no emissions will occur or need to be quantified from the conveyors themselves, except those whose sides are insufficient to keep all transported material well away from wind. The emissions from those few conveyors with sides insufficient to eliminate wind erosion of materials being transported are quantified in the emission inventory and included in the summary tables in this section. Storage emissions quantified are limited to the ash hopper, the log yard waste pile and the Wood Debris Management Area. The latter two have no enclosures, but contain mostly large, moist material. All other storage bins are sealed, and have no emissions other than the transfers into and out of them.

All drops onto and from conveyors are identified as transfer points. Emission calculations are provided for the more than 40 transfer points, some of which have little or no emissions because any potential emissions are physically contained.

All facility cyclones are considered process equipment rather than pollution control equipment because they all separate out materials that are directly used as boiler fuel or saleable products, or are subsequently processed into boiler fuel or saleable products.

All emission rates and documentation of the derivation of emission factors, emission calculations, and emission control efficiencies are included in the detailed emission inventory in Appendix B. Manufacturer's specifications for the boiler, including HAP emissions per MMBtu/hr, are also in the Emission Inventory in Appendix A.

PTE emission calculations are based upon a material balance of wood products incorporating mass conservation at full permitted facility capacity (maximum facility input and maximum output volumes balance, with throughput at intermittent processes consistent with the facility-wide balance). As noted that material balance was refined slightly since operations have begun to reflect actual throughputs while maintaining conservation of mass. As noted, all changes from PTC PTE calculations result only in a small net decrease in fugitive emissions. PTC permit limits on HAP emissions from the dry kiln and boiler and tracking to verify emissions stay below the HAP major source threshold ensure that the Potential to Emit (PTE) and actual emissions do not exceed the major source threshold for HAPs.

## **EMISSIONS LIMITS AND MRRR**

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Hog Fuel Boiler Emissions Limits;
- Process Equipment Emissions Limits;
- Fire Pump Engine Emissions Limits;
- Tier I Operating Permit General Provisions.

### ***MRRR***

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable

requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling. In addition to the specific MRRR described under each permit condition, generally applicable facility-wide conditions and general provisions may also be required, such as monitoring, recordkeeping, performance testing, reporting, and certification requirements.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, a description of why and how the condition was changed is provided.

#### ***State Enforceability***

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

#### ***Federal Enforceability***

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

### **5.1 Facility-Wide Conditions**

#### **Permit Condition 3.1-3.4 - Fugitive Dust**

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/07]

#### **MRRR (Permit Conditions 3.1 through 3.4)**

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct facility-wide inspections of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

#### **Permit Condition 3.5 -3.6 - Odors**

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), 5/1/94]

#### **MRRR (Permit Condition 3.5-3.6)**

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State only), 5/1/94]

### **Permit Condition 3.7 -3.9 Visible Emissions**

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, nitrogen oxides, 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, 4/5/00]

#### **MRRR (Permit Condition 3.7-3.)**

- Conduct facility-wide inspections of all emissions units subject to the visible emissions standards (or rely on continuous opacity monitoring);
- If visible emissions are observed, take appropriate corrective action and/or perform a Method 9 opacity test;
- Maintain records of the results of each visible emissions inspection.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

### **Permit Conditions 3.10 through 3.14 - Excess Emissions**

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 and the regulations of IDAPA 58.01.01.130-136.

#### **MRRR (Permit Conditions 3.10 through 3.14)**

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory;
- Notify DEQ of each excess emissions event as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ;
- Maintain records of each excess emissions event.

### **Permit Condition 3.15 – Fuel-Burning Equipment PM Standards**

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

[IDAPA 58.01.01.676-677, 5/1/94]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

### **Permit Condition 3.16 - Sulfur Content Limits**

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, 3/29/10]

**MRRR - (Permit Condition 3.17)**

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

[IDAPA 58.01.01.322.06, 5/1/94]

**Permit Condition 3.18 - Open Burning**

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 5/08/09]

**MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 3.19 - Asbestos**

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

**MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 3.20 - Accidental Release Prevention**

**(a)**

An owner or operator 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 presents 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)]

[40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 68.215(a)(ii)]

**MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 3.21 - Recycling and Emissions Reductions**

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]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

#### **Permit Condition 3.22 and 3.24- NSPS/NESHAP General Provisions**

This facility is subject to NSPS/NESHAP Subparts Db, ZZZZ and JJJJJ, and is therefore required to comply with applicable General Provisions.

[40 CFR 60 and 40 CFR 63, Subpart A]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

#### **Permit Condition 3.25 - Monitoring and Recordkeeping**

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, 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.

The permittee is not required to conduct the monitoring and associated recordkeeping for any emission unit if the emissions unit did not operate at any time between required monitoring events, provided the following conditions are met:

- The permittee makes a contemporaneous record in the log or file maintained on site of the date and time that the emission unit ceased operation, and the reason why the emission unit did not operate.
- The permittee makes a contemporaneous record in a log or file maintained on site of the date and time that the emission unit resumed operation.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

#### **Permit Conditions 3.26 through 3.29 - Performance Testing**

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.

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, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

**MRRR (Permit Conditions 3.29 and 3.30)**

The permittee shall submit compliance test report(s) to DEQ following testing.

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

**Permit Condition 3.30 - Reports and Certifications**

This permit condition establishes generally applicable MRRR for submittal of reports, certifications, and notifications to DEQ and/or EPA as specified.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

**MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 3.31 - Incorporation of Federal Requirements by Reference**

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.

[IDAPA 58.01.01.107, 4/7/11]

**MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**5.2 Emissions Unit-Specific Emissions Limits and MRRR**

**Hog Fuel Boiler**

**Permit Condition 4.1**

Emissions of PM<sub>10</sub> from the boiler stack shall not exceed 6.6 pounds per hour (lb/hr).

[PTC No. P-2008.0204, 2/17/09]

**MRRR - (permit Condition 4.1)**

This permit condition states the hourly rate of PM<sub>10</sub> emissions the boiler is permitted to emit. Compliance with this emission limit is demonstrated with performance tests as stated in other conditions of this permit. The boiler shall be operated within the parameters determined during the performance test process. The frequency of performances tests and the results reporting requirements are stated in other conditions of this permit.

**Permit Condition 4.2**

Particulate matter emissions from the boiler shall not exceed 0.1 pounds per million Btu of heat input in accordance with 40 CFR 60.43b (c) (1). When compliance is determined, this shall be done by conducting a performance test as specified in 40 CFR 60.8.

[PTC No. P-2008.0204, 2/17/09; 40 CFR 60.43b]

**MRRR - (permit Condition 4.2)**

This permit condition states the NSPS emission rate for PM. Compliance with this emission limit is demonstrated with performance tests as stated in other conditions of this permit. The boiler shall be operated within the parameters determined during the performance test process. The frequency of performance tests and the results reporting requirements are stated in other conditions of this permit.

### **Permit Condition 4.3**

#### **Opacity limits**

**Permit Condition 4.3.1** On and after the date on which the initial performance test is completed or is required to be completed under 40 CFR 60.8, whichever date comes first, the boiler shall not discharge into the atmosphere any gases that exhibit greater than 20% opacity (six-minute average), except for one six-minute period per hour of not more than 27% opacity, in accordance with 40 CFR 60.43b(f).

The particulate matter and opacity standards apply at all times, except during periods of startup, shutdown or malfunction in accordance with 40 CFR 60.43b(g).

[40 CFR 60.43b]

**Permit Condition 4.3.2** The permittee shall not discharge any air pollutant to the atmosphere from the boiler stack 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, 4/5/00; PTC No. P-2008.0204, 2/17/09]

#### **MRRR - (permit Condition 4.3)**

This permit condition states the opacity limits the Wellons boiler can operate and demonstrate compliance. The opacity shall be monitored by the permit conditions within the facility-wide conditions. The recordkeeping and reporting of the results regarding opacity are stated in other permit conditions of the permit. Compliance shall be demonstrated with opacity is observed and recorded.

#### **Permit Condition 4.4**

The amount of steam produced by the boiler shall not exceed 1.92 million pounds of steam per day.

[PTC No. P-2008.0204, 2/17/09]

#### **MRRR - (permit Condition 4.4)**

This permit condition states the amount of steam the Wellons boiler can produce in a day. Compliance shall be demonstrated through monitoring of the steam production and keeping of records as stated in operating permit conditions of the permit.

#### **Permit Condition 4.5**

The permittee shall fire the boiler exclusively with biomass.

#### **MRRR - (permit Condition 4.5)**

This permit states the type of fuel the Wellons boiler can combust. This permit changes the term from wood products to biomass which is the new category for wood products. Compliance shall be demonstrated with the monitoring of fuel type and the fuel analysis required from other permit conditions of this permit.

#### **Permit Condition 4.6**

4.6.1 A multiclone and an ESP shall be used to control PM and PM<sub>10</sub> emissions from the boiler. The multiclone and the ESP shall be maintained in good working order and operated as efficiently as practical in accordance with the Operations and Maintenance (O&M) manual specifications required by Permit Condition. 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.

4.6.2 For the ESP, the permittee shall install, maintain, and operate, in accordance with the O&M manual specifications, equipment to measure the secondary voltage, amperage, and power (where power equals the voltage multiplied by the amperage) applied by each transformer/rectifier (T/R) set to the discharge electrodes, and the spark rate, to demonstrate compliance with Permit Condition.

4.6.3 The secondary voltage, amperage and power applied by each T/R set to the discharge electrodes, and the spark rate, of the ESP shall be maintained within O&M manual specifications. Documentation of O&M manual voltage, amperage, power input and spark rate specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-2008.0204, 2/17/09]

**MRRR - (permit Condition 4.6)**

This permit condition states the control devices that will be controlling the emissions from the Wellons boiler. These conditions state the parameters that will be monitoring the control devices and the O&M manual that will be followed to establish good working order and good air pollution control. The recordkeeping of the operational settings demonstrated within the CAM plan stated with the permit shall demonstrate compliance with this and other permit conditions.

**Permit Condition 4.7**

**Continuous Opacity Monitoring System (COMS) - NSPS**

4.7.1 For the boiler, the permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system in accordance with 40 CFR 60.48b(a) or per an EPA-approved alternative.

4.7.2 The COMS data shall be reduced and recorded in such a manner that compliance with all applicable opacity standards can be demonstrated.

[PTC No. P-2008.0204, 2/17/09; 40 CFR 60.48b]

**MRRR - (permit Condition 4.7)**

This permit condition states the installation of a COMS system that will demonstrate compliance with the opacity limits for the exhaust gases from the Wellons boiler through recorded data that is within the opacity limits of this permit.

**Permit Condition 4.8**

In accordance with 40 CFR 63.11196(a), the permittee must conduct the initial tune-up no later than March 21, 2014.

[40 CFR 63.11196(a)(1)]

**MRRR - (permit Condition 4.8)**

This permit condition states the initial reporting date for the Wellons boiler to demonstrate compliance with 40 CFR 63.11196(a). IFG has performed its initial tune-up and has submitted a notice of compliance for the boiler.

**Permit Condition 4.9**

In accordance with 40 CFR 63.11196(a), the permittee must conduct the energy assessment no later than March 21, 2014.

[40 CFR 63.11196(a)(3)]

**MRRR - (permit Condition 4.9)**

This permit condition states the date the permittee must conduct an energy assessment to demonstrate compliance with 40 CFR 63.11196(a). The one time energy assessment criteria to demonstrate compliance is stated in another permit condition.

**Permit Condition 4.10**

In accordance with 40 CFR 63 Subpart JJJJJ Table 2, the permittee must conduct a tune-up of the boiler biennially, each biennial tune-up specified must be conducted no more than 25 months after the pervious tune-up. The permittee must conduct the tune-up while burning the type of fuel that provided the majority of the heat input to the boiler over the 12 months prior. The management practices in Table 2 of subpart JJJJJ apply at all times.

[40 CFR 63 Subpart JJJJJ Table 2, 63.11201(b), (d), 40 CFR 63.11223(a)]

**MRRR - (permit Condition 4.10)**

This permit condition states the time line for the biennial tune ups to demonstrate compliance with 40 CFR 63 subpart JJJJJ.

**Permit Condition 4.11**

In accordance with 40 CFR 63 Subpart JJJJJ, Table 2, the permittee must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include:

- A visual inspection of the boiler or process heater system.
- An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,
- An inventory of major energy consuming systems,
- A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
- A list of major energy conservation measures,
- A list of the energy savings potential of the energy conservation measures identified, and
- A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time for recouping those investments.
- The energy assessment will be 8 on-site technical labor hours in length maximum, but may be longer at the discretion of the owner or operator of the affected source. The boiler system(s) and any on-site energy use system(s) accounting for at least 50 percent of the affected boiler(s) energy ( e.g., steam, hot water, or electricity) production, as applicable, will be evaluated to identify energy savings opportunities, within the limit of performing an 8-hour energy assessment.

[40 CFR 63 Subpart JJJJJ, Table 2, 40 CFR 63.11201(b), 40 CFR 63.11237]

**MRRR - (permit Condition 4.11)**

This permit conditions states the performances that must be incorporated in the one-time energy assessment that is required to demonstrate compliance with 40 CFR 63 Subpart JJJJJ, Table 2.

**Permit Condition 4.12**

In accordance with 40 CFR 63.11205(a), the permittee must operate and maintain the unit in a matter consistent with safety and good air pollution control practices for minimizing emissions.

[40 CFR 63.11205(a)]

**MRRR - (permit Condition 4.12)**

This permit condition states to demonstrate compliance with CFR 63.11205(a) the permittee must operate and maintain the equipment in safe and with good air pollution control practices.

**Permit Condition 4.13**

In accordance with 40 CFR 63.11210(c), the permittee must demonstrate initial compliance with the work practice standard and management practice above by dates listed above.

[40 CFR 63.11210(c)]

**MRRR - (permit Condition 4.13)**

The permit condition states the dates that compliance with the work practice standards and management practices are to be demonstrated. The work practice standards and management practices are stated in Table 2 of Subpart JJJJJJ.

**Permit Condition 4.14**

In accordance with 40 CFR 63.11223(b), the permittee must conduct a tune-up of the boiler or process heater biennially to demonstrate continuous compliance as follows:

- As applicable, inspect the burner, and clean or replace any components of the burner as necessary ( you may delay the burner inspection until the next scheduled unit shutdown, but you inspect each burner at least every 36 months);
- 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;
- Optimize total emissions of carbon monoxide. This optimization should be consistent with manufacturer's specifications, if available;
- Measure the concentrations in the effluent stream of carbon monoxide 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 the Administrator, a biennial report containing the following information:
  - The concentrations of carbon monoxide in the effluent stream in part per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler;
  - A description of any corrective actions taken as a part of the combustion adjustment; and
  - The type and amount of fuel used over the 12 month prior to the biennial tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period.
- If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

[40 CFR 63.11223(b)]

**MRRR - (permit Condition 4.14)**

This permit condition states the process that is included in the tune-up so the boiler biennially can demonstrate compliance. The boiler used at the facility does not have a burner, thus the "as applicable" statement in some of the above mentioned regulations related to the burner are not applicable to the facility.

## **Permit Condition 4.15**

### **Steam and Fuel Monitoring and Recordkeeping Requirements**

4.15.1 The permittee shall monitor and record the total pounds of steam produced by the boiler on a daily basis. Records shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

4.15.2 For purposes of complying with the requirements under 40 CFR 60.49b(d), the permittee is not required to monitor the amount of wood combusted each day or to calculate the annual capacity factor for wood in accordance with the alternative method approved by EPA Region 10 in a letter issued to Bennett Forest Industries (now IFG) on October 4, 2005.

[PTC No. P-2008.0204, 2/17/09; 40 CFR 60.49b]

### **MRRR - (permit Condition 4.15)**

This permit condition states the monitoring and recording of the steam production to demonstrate compliance with permit conditions of this permit.

## **Permit Condition 4.16**

### **PM and PM<sub>10</sub> Performance Test**

At least once every five years the permittee shall conduct a performance test to measure PM and PM<sub>10</sub> emissions from the boiler stack. The test shall be conducted to demonstrate compliance with the emission rate limits specified by Permit Conditions. Each performance test conducted to demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157, and the following information shall be complied with during each test run:

- Visible emissions from the boiler stack shall be observed and recorded using the methods specified in IDAPA 58.01.01.625 to demonstrate compliance with Permit Condition 4.3.
- The boiler shall be operated at the worst case normal feed material throughput rate during the performance test. A description of how this requirement was met shall be included in the performance test report.
- The following parameters shall be monitored and recorded during each PM and PM<sub>10</sub> performance test on the boiler stack:
  - Wood-waste fuel analysis including percent moisture and BTUs per pound (Btu/lb)
  - Amount of steam produced in units of pounds of steam per hour; and

Secondary voltage, amperage, and power (where power equals the voltage multiplied by the amperage) applied by each T/R set of the ESP to the discharge electrodes, and the spark rate.

After the initial performance test, future testing shall be performed according to the following schedule. If the PM and PM<sub>10</sub> emission rate measured in the most recent test is less than or equal to 75% of the emission standard in this permit, the next test shall be conducted within five years of the test date. If the PM and PM<sub>10</sub> emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the emission standard in this permit, the next test shall be conducted within two years of the test date. If the PM and PM<sub>10</sub> emission rate measured during the most recent performance test is greater than 90% of the emission standard in this permit, the next test shall be conducted within one year of the test date.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-2008.0204, 2/17/09]

### **MRRR - (permit Condition 4.16)**

This permit conditions states the frequency of the performance tests, what pollutant will be tested and the parameters to be recorded while testing to demonstrate compliance with the permit's conditions.

## **Permit Condition 4.17**

### **Monitoring Requirement**

When the boiler is operating, the permittee shall monitor and record the secondary voltage, amperage and power applied by each T/R set to the discharge electrodes, and the spark rate at least once every four hours. The units of measure and averaging time of measurements of secondary voltage, amperage, power, and spark rate recorded shall be consistent with O&M manual units of measure. A compilation of the most recent five years of voltage, amperage, power and spark rate records shall be kept at the facility and shall be made available to DEQ representatives upon request.

[PTC No. P-2008.0204, 2/17/09]

### **MRRR - (permit Condition 4.17)**

This permit condition states the parameters of the control devices that require monitoring and the frequency of the monitoring. The ranges for this monitoring and recording are determined from the ranges observed during a performance test(s) that has demonstrated compliance with the operational limits stated in other permit conditions.

### **Permit Condition 4.18**

#### **Operations and Maintenance Manual Requirements**

Operation and Maintenance manuals (or a single manual) shall be maintained for the boiler, the multiclone, and the ESP. The permittee shall maintain an O&M manual for the multiclone and the ESP according to manufacturer specifications and recommendations. The manual(s) shall be revised within 30 days of issuance of this permit to incorporate any changes made as part of this permit. This manual shall describe the methods and procedures that will be followed to assure the boiler, multiclone, and the ESP are maintained in good working order and operated as efficiently as practical. The O&M manuals shall be updated as necessary and shall include the following, at a minimum: the most recent general descriptions of the equipment; manufacturer's recommended settings regarding secondary voltage, amperage and power for each T/R set of the ESP and the spark rate; the normal operating conditions and procedures for the boiler; startup, shutdown, and maintenance procedures; inspection procedures and inspection frequency; upset conditions guidelines; and corrective action procedures.

[PTC No. P-2008.0204, 2/17/09]

### **MRRR - (permit Condition 4.18)**

This permit condition states the permittee shall have an operation and maintenance manual developed that states the procedures required to maintain the control devices in good working order.

### **Permit Condition 4.19**

In accordance with 40 CFR 63.11225(c), the permittee must keep the following records:

- Copies of each notification and report submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status.
- Records of the date of each tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
- Copy of energy assessment report.
- Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
- Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in Section 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

[40 CFR 63.11225(c)]

### **MRRR - (permit Condition 4.19)**

This permit condition states the records that need be established to demonstrate compliance with Notifications of Compliance, tune-ups, fuel used, and any malfunctions associated with air pollution control and monitoring equipment.

**Permit Condition 4.20**

In accordance with 40 CFR 63.11225(d), records must be in a form suitable and readily available for expeditious review. Records must be kept for 5 years, two of which must be on-site. Records may be kept off-site for the remaining three years.

[40 CFR 63.11225(d)]

**MRRR - (permit Condition 4.20)**

This permit condition states the timeline and location the records are to be kept to demonstrate compliance.

**Permit Condition 4.21**

The permittee is strongly encouraged to submit a compliance test protocol for approval at least 30 days prior to conducting any compliance test required by this permit. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the test does not satisfy the testing requirements.

[PTC No. P-2008.0204, 2/17/09]

**MRRR - (permit Condition 4.21)**

This permit condition states strongly the need of compliance test protocol 30 days prior to a compliance test. This is helpful for all parties to establish credibility of the test.

**Permit Condition 4.22**

The permittee must conduct a tune-up and submit a signed statement in the Notification of Compliance Status report that indicates that the tune-up has been completed.

[40 CFR 63.11214(b)]

**MRRR - (permit Condition 4.22)**

This permit condition states to demonstrate compliance with the Notification of Compliance Status report the tune-up be certified.

**Permit Condition 4.23**

In accordance with 40 CFR 63.11214(c), the permittee must submit a signed certification in the Notification of Compliance Status report that indicates that an energy assessment of the boiler and energy use system has been completed and submit, upon request, the energy assessment report.

[40 CFR 63.11214(c)]

**MRRR - (permit Condition 4.23)**

This permit condition states to demonstrate compliance with the Notification of Compliance Status report the energy assessment and the energy use system report be certified.

**Permit Condition 4.24**

In accordance with 40 CFR 63.11225(a)(1)-(2), the permittee must submit an initial notification as specified in Section 63.9(b)(2) not later than 120 days after May 20, 2014.

[40 CFR 63.11225(a)(1)-(2)]

**MRRR - (permit Condition 4.24)**

This permit condition states to demonstrate compliance with the initial notification the permittee must submit the notification no later than 120 days after May 20, 2014.

#### **Permit Condition 4.25**

In accordance with 40 CFR 63.11225(a)(4), the permittee must submit a Notification of Compliance Status in accordance with 40 CFR 63.9(h) no later than 120 days after the applicable compliance dates for tune-ups and energy assessment listed above. The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ( [www.epa.gov/cdx](http://www.epa.gov/cdx) ). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in § 63.13. In addition to the information required in 40 CFR 63.9(h)(2) the notification must include the following statements, as applicable:

- “This facility complies with the requirements in Section 63.11214 to conduct an initial tune-up of the boiler.”
- “This facility has had an energy assessment performed according to Section 63.11214(c).”

[40 CFR 63.11225(a)(1), (4)]

#### **MRRR - (permit Condition 4.25)**

This permit condition states the time limit for the permittee to submit a Notification of Compliance regarding the tune-up and energy assessment required in this permit.

#### **Permit Condition 4.26**

In accordance with 40 CFR 63.11225(b), the permittee must prepare by March 1 of every other year, and submit to the delegated authority upon request, a biennial compliance certification report. If there are any instances of deviations from applicable requirements during the reporting period, the permittee must submit the report by March 15. The report must include the following:

- Company name and address
- Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all relevant standards and other requirements of this subpart
- If the source experiences any deviation from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

[40 CFR 63.11225(b)]

#### **MRRR - (permit Condition 4.26)**

This permit condition states the frequency the permittee is required to prepare a biennial compliance certification report and the individual responsible to sign the report. If the material required on the forms for the semi and annual certifications stated in the General Provisions is the same as the required information stated in Permit Condition 4.26, then forms submitted by the facility on January 30<sup>th</sup> satisfying the General Provisions should also satisfy the request of Permit Condition 4.26.

#### **Permit Condition 4.27**

##### **Compliance Test Report**

The permittee shall submit a report of the results of any compliance test and the results of any fuel analysis required in by this permit, including all required process data, to DEQ within 30 days after the date on which any required compliance test is concluded, in accordance with IDAPA 58.01.01.157.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-2008.0204, 2/17/09]

#### **MRRR - (permit Condition 4.27)**

This permit conditions establishes the timeline to submit the data from a compliance test to demonstrate compliance.

#### **Permit Condition 4.28**

### **New Source Performance Standards 40 CFR 60, Subpart D**

The permittee shall comply with the Permit Conditions developed, based on, or taken from 40 CFR 60 Subpart A and Subpart Db for the Wellons boiler.

Should there be an inconsistency between 40 CFR 60 Subpart A and Subpart D, and Permit Conditions 3.2 through 3.15, requirements in 40 CFR 60 Subpart A and Subpart D shall govern.

The Administrator in 40 CFR 60 Subpart D is DEQ, unless otherwise stated.

[PTC No. P-2008.0204, 2/17/09; 40 CFR 60 Subparts A and D]

#### **MRRR - (permit Condition 4.28)**

This permit conditions states the permittee has more than one NSPS subpart to demonstrate compliance with as they apply. It also states if there is conflict of conditions regarding permit conditions and regulations in the various subparts the regulations shall govern.

#### **Permit Condition 4.29**

#### **NSPS 40 CFR 60 Subpart A –General Provisions**

Generally applicable requirements of Subpart A of the New Source Performance Standards (NSPS, 40 CFR 60) are summarized in Table 3.3. These summaries are provided to aid the permittee in understanding the general requirements and to highlight the notification and record keeping requirements of 40 CFR 60 for affected facilities. These summaries do not relieve the permittee from the responsibility to comply with all applicable requirements of the CFR, and are not intended to be a comprehensive listing of all requirements that may apply. Should there be a conflict between these summaries and the NSPS, the NSPS shall govern.

[PTC No. P-2008.0204, 2/17/09; 40 CFR 60, Subpart A]

#### **MRRR - (permit Condition 4.29)**

This permit condition states the permittee must demonstrate compliance with each requirement is 40 CFR 60 Subpart that apply.

### **PROCESS EQUIPMENT**

#### **Permit Condition 5.1**

The Idaho Forest Group LLC shall emit less than the following amounts of any hazardous air pollutant which has been listed pursuant to 42 U.S.C. Section 7412(b), as defined under IDAPA 58.01.01.008.10.a. For purposes of complying with this requirement, a year is defined as any consecutive 12-month period:

- 10 tons per year of methanol; and
- 25 tons per year of any combination of any hazardous air pollutants

[IDAPA 58.01.01.008.10.a, 5/1/94; PTC No. P-2008.0204, 2/17/09]

#### **MRRR - (permit Condition 5.1)**

This permit condition requires the facility to operate in the manner that HAPs emissions of methanol does not exceed 10 tons per year and the facility does not release a combined HAPs emission of 25 tons per year to remain below major classification.

#### **Permit Condition 5.2**

#### **Formaldehyde Emission Limit**

The combined emissions of formaldehyde from all of the kilns shall not exceed 714 pounds per any consecutive 12-month period (lb/yr).

[PTC No. P-2008.0204, 2/17/09]

#### **MRRR - (permit Condition 5.2)**

This permit conditions the facility to operate that the kilns emissions of formaldehyde does not exceed 714 pound per any consecutive 12-month period

### **Permit Condition 5.3**

#### **Kiln Throughput Limit**

The total quantity of wood dried in the all of the kilns shall not exceed 250 million board feet per any consecutive 12-month period.

[PTC No. P-2008.0204, 2/17/09]

#### **MRRR - (permit Condition 5.3)**

This permit condition requires the facility to operate at or below 250 million board feet per any consecutive 12-month. Since the calculation for emissions were based on the throughput of the kilns it is important the boardfeet is recorded.

### **Permit Condition 5.4**

#### **Baghouses**

5.4.1 The permittee shall install, maintain, and operate a Baghouse to control PM emissions from Cyclone 11 (sawmill sawdust) and a Baghouse to control emissions from cyclone 72 (planer shavings). Each Baghouse shall be operated at all times that the cyclone connected to it is operating.

[PTC No. P-2008.0204, 2/17/09]

5.4.2 When in operation, the pressure drop across each Baghouse shall be maintained within manufacturer's and Operation and Maintenance (O&M) Manual specifications. Documentation of the operating pressure drop specifications for each Baghouse shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-2008.0204, 2/17/09]

#### **MRRR - (permit Condition 5.4)**

This permit condition requires the conditions and operational manner of the baghouse are maintained to specifications. The integrity of the baghouse and the manner in which is operated are important to the validity of the emissions released to the atmosphere.

### **Permit Condition 5.5**

#### **Baghouse Monitoring Equipment**

The permittee shall install, maintain, and operate, in accordance with manufacturer's specifications, equipment to measure the pressure differential across each Baghouse.

[PTC No. P-2008.0204, 2/17/09]

#### **MRRR - (permit Condition 5.5)**

This permit condition requires the conditions and operational manner of the baghouse are maintained to specifications. The integrity of the baghouse and the manner in which is operated are important to the validity of the emissions released to the atmosphere

**Permit Condition 5.6**

**Methanol Monitoring**

The total combined emissions of methanol from all of the lumber drying kilns (kilns) shall be calculated and recorded on a monthly basis, in units of tons per month and tons per consecutive 12-month period (T/yr), to demonstrate compliance with Permit Condition 5.1.1. Methanol emissions from all of the kilns shall be calculated using the equation given below and the emission factors in Table 5.2, or DEQ-approved factors:

$$Kiln\ HAP = \sum_{i=1}^n (X_i \times Y_i)(ton/2000lbs)$$

Where:

Kiln HAP = Kiln Emissions of a specific HAP per month (ton/mo)

n = Number of types of wood dried

Xi = Throughput, in mbf, of lumber of type i dried in all kilns per month (mbf/mo)

Yi = Methanol emission factor for lumber of type i

**Table 4.1 HAP EMISSION FACTORS <sup>a</sup>**

Type of wood dried	Methanol <sup>b</sup> (lb/mbf)	Formaldehyde <sup>b</sup> (lb/mbf)	Acetaldehyde <sup>c</sup> (lb/mbf)	MEK <sup>c, d</sup> (lb/mbf)	Phenol <sup>e</sup> (lb/mbf)
Ponderosa	0.065	0.0029	0.0078	0.0013	0.004
White Fir	0.122	0.0028	0.0078	0.0013	0.004
Lodgepole	0.060	0.0040	0.0078	0.0013	0.004
Douglas Fir	0.023	0.0010	0.0078	0.0013	0.004

<sup>a</sup>Use the factors in this table, or DEQ-approved alternative factors in the kiln emissions equation

<sup>b</sup>Factors from the Oregon State University Small-scale Kiln Study, Milota, September 29, 2000

<sup>c</sup>NCASI factors as published in Table D-4 of the June 9, 2000 letter from K. Hanks, MRI, to M. Kissell, EPA

<sup>d</sup>Methyl ethyl ketone (MEK); pounds per 1000 board feet (lb/mbf)

<sup>e</sup>Olympic Region Clean Air Agency emission factor

[PTC No. P-2008.0204, 2/17/09]

**MRRR - (permit Condition 5.6)**

This permit condition provides the method of calculating the HAPs release for these various woods. The facility is permitted to use this permit condition to determine compliance with other permit conditions of the permit.

**Permit Condition 5.7**

**25 TPY HAP Monitoring**

The total combined emissions of all HAPs from all of the kilns and the Wellons boiler shall be calculated and recorded on a monthly basis, in units of tons per month and tons per consecutive 12-month period (T/yr), to demonstrate compliance with the 25 TPY aggregate HAP limit given in Permit Condition 5.1.2.

The total HAP emissions from all of the kilns shall be determined by calculating the combined emissions of methanol, formaldehyde, acetaldehyde, methyl ethyl ketone (MEK), and phenol from all of the kilns using the equation format specified in Permit Condition 5.6.

HAP emissions from the Boiler shall be calculated using the equation below.

$$BoilerHAP = \sum_{i=1}^n (X_i \times Y_i) (1/0.65) (995 \text{ Btu/lb-steam}) (ton/2000lbs)$$

Where:

Boiler HAP = Boiler HAP emissions per month (ton/mo)

n = Number of different HAPs emitted by the Boiler

X<sub>i</sub> = Steam production in million pounds per month (MMlb-steam/mo)

Y<sub>i</sub> = Emission factor for HAP "i" from AP-42 Section 1.6 or a DEQ-approved factor

[IDAPA 58.01.01.008.10.a.ii, 5/1/94; PTC No. P-2008.0204, 2/17/09]

#### **MRRR - (permit Condition 5.7)**

This permit condition provides the method of calculating the HAPs release for the boiler burning of wood. The facility is permitted to use this permit condition to determine compliance with other HAPs permit conditions of the permit and the HAPs release for the boiler.

#### **Permit Condition 5.8**

##### **Formaldehyde Monitoring**

The total combined emissions of formaldehyde from all of the kilns shall be calculated and recorded on a monthly basis, in units of pounds per month and pounds per consecutive 12-month period (lb/yr), to demonstrate compliance with the kiln emission limit in Permit Condition 5.2. The formaldehyde emissions shall be calculated using the equation format given in Permit Condition 5.6.

[PTC No. P-2008.0204, 2/17/09]

#### **MRRR - (permit Condition 5.8)**

This permit condition provides the records to demonstrate compliance the facility does not emit HAPs emission of 10 ton per year of any HAP or 25 ton per year of any combination of HAPs.

#### **Permit Condition 5.9**

##### **Kiln Throughput**

Each month, the permittee shall monitor and record the following kiln production information in units of board feet per month (bf/mo) and board feet per the most recent consecutive 12-month period (bf/yr):

- The quantity of each species of wood processed in all of the kilns; and
- The total sum of all wood species processed in all of the kilns.

[PTC No. P-2008.0204, 2/17/09]

#### **MRRR - (permit Condition 5.9)**

This permit condition provides the recordkeeping demonstrating compliance with the permit condition limiting the boardfeet of lumber per year entering the kilns.

## **Permit Condition 5.10**

### **Baghouse Operations and Maintenance Manual Requirements**

An Operation and Maintenance manual shall be maintained to address each of the two baghouses. The permittee shall develop the O&M manual according to the manufacturer's specifications and recommendations for each baghouse. This manual shall describe the methods and procedures that will be followed to assure that each baghouse is maintained in good working order and operated as efficiently as practical. The O&M manual shall be updated as necessary and shall include, at a minimum, the most recent general descriptions of the equipment, the normal operating conditions, the manufacturer's recommended minimum and maximum pressure drops for each Baghouse, maintenance procedures, inspection procedures and inspection frequency, and upset condition guidelines.

[PTC No. P-2008.0204, 2/17/09]

### **MRRR - (permit Condition 5.10)**

This permit condition provides the method and maintenance required to maintain the operation of the baghouse in good working order and maintain the emissions that were used to determine the amount of emission entering the atmosphere.

## **Permit Condition 5.11**

### **Baghouse Pressure Drop Monitoring**

When a Baghouse is operated, the permittee shall measure and record the following information on a weekly basis:

- The pressure drop across the Baghouse connected to Cyclone 11; and
- The pressure drop across the Baghouse connected to Cyclone 72.

[PTC No. P-2008.0204, 2/17/09]

### **MRRR - (permit Condition 5.11)**

This permit conditions provide the method of determining the operational parameter of these cyclones to limit the emissions from the cyclone to demonstrate compliance with the efficiency the baghouses claimed in determining the emissions from these sources.

## **FIRE PUMP ENGINE**

### **Permit Condition 6.1**

In accordance with 40 CFR 63.6595(a), the engine identified above must comply with the applicable requirements of NESHAP ZZZZ before May 3, 2013.

[40 CFR 63.6595(a)(1)]

### **MRRR - (permit Condition 6.1)**

This permit condition states the engine running the fire pump is applicable to 40 CFR 63 Subpart ZZZZ and shall demonstrate compliance as the requirements apply.

### **Permit Condition 6.2**

In accordance with 40 CFR 63.6603(e), the permittee shall change the oil and filter every 1000 hours of operation or annually, whichever comes first or at a frequency determined by an oil sample and analysis program as follows

- Sample and analyze the oil annually or every 1000 hours of operation, whichever comes first to determine total base number, viscosity, and water content by volume.
- If one or more of the following condemning limits for these parameters is exceeded then the permittee is required to change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation then the permittee must change the oil within 2 days of receiving the results or before commencing operation, whichever is later.
  - Total Base Number is less than 30% of the Total Base Number when the oil is new.
  - Viscosity of the oil has changed by more than 20% from the viscosity of the oil when new.
  - Percent Water Content (by volume) is greater than 0.5.
  - The permittee must keep records of the oil analysis results and the oil and filter changes for the engine.

[40 CFR 63.6603 Table 2d, 40 CFR 63.6603(a), 40 CFR 63.6625(i)]

**MRRR - (permit Condition 6.2)**

This permit condition states the operational condition that need to be met for the engine to demonstrate compliance with subpart ZZZZ.

**Permit Condition 6.3**

In accordance with 40 CFR 63.6603 Table 2d, the permittee shall inspect airs cleaners every 1000 hours of operation or annually, whichever comes first.

[40 CFR 63.6603 Table 2d, 40 CFR 63.6603(a)]

**MRRR - (permit Condition 6.3)**

This permit condition demonstrates compliance with 40 CFR 63 subpart ZZZZ regarding the air cleaner requirement stated in Table 2d.

**Permit Condition 6.4**

In accordance with 40 CFR 63.6603 Table 2d, the permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6603 Table 2d, 40 CFR 63.6603(a)]

**MRRR - (permit Condition 6.4)**

This permit condition demonstrate compliance with 40 CFR 63 subpart ZZZZ regarding the hoses and belts requirement stated in Table 2d.

**Permit Condition 6.5**

In accordance with 40 CFR 63.6625(e), the permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must ensure, to the extent practicable, the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e)]

**MRRR - (permit Condition 6.5)**

This permit condition states the procedure for operation and maintenance of the RICE will be either in accordance with the manufacturer's written instructions or with the facility determined maintenance plan to maintain the good air pollution control practice for minimizing emissions.

**Permit Condition 6.6**

In accordance with 40 CFR 63.6625(h), the permittee must minimize the engine's time spent at idle and at startup to a period needed for appropriate and safe loading, not to exceed 30 minutes, after which time the non-startup emissions limitations apply.

[40 CFR 63.6625(h)]

**MRRR - (permit Condition 6.6)**

This permit condition states the practices the permittee shall be using for idle and startup period. These periods are not to exceed a time limit of 30 minutes.

**Permit Condition 6.7**

In accordance with 40 CFR 63.6605(a-b), the permittee must be in compliance with the preceding management practice standards at all times as well as maintaining and operating any affected source in a manner consistent with safety and good air pollution control.

[40 CFR 63.6605(a-b)]

**MRRR - (permit Condition 6.7)**

This permit condition states the permittee shall maintain good air pollution control practices with the RICE but maintain safety and good air pollution control practices with any affected source.

**Permit Condition 6.8**

In accordance with 40 CFR 63.6640(a), the permittee must demonstrate compliance with the preceding management practice standards by operating and maintaining the stationary RICE according to the manufacturer's emission-related instructions or by developing and following their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice.

[40 CFR 63.6640(a), Table 6]

**MRRR - (permit Condition 6.8)**

This permit condition states the permittee shall maintain the management practice standards according to the manufacturer's instructions or by their own maintenance plan in a manner consistent with good air pollution control practice.

**Permit Condition 6.9**

In accordance with 40 CFR 63.6640(e), each instance in which the unit did not meet the requirements of the applicable general provisions listed in Table 8 of this subpart must be recorded.

[40 CFR 63.6640(e)]

**MRRR - (permit Condition 6.9)**

This permit conditions states the reporting of any requirement(s) of Table 8 of the applicable general provisions in Table 8 not met.

**Permit Condition 6.10**

In accordance with 40 CFR 63.6655(e), if the permittee follows their own maintenance plan rather than the manufacturer's written instructions they must keep records of maintenance conducted on the stationary RICE.

[40 CFR 63.6655(e)]

**MRRR - (permit Condition 6.10)**

This permit condition states if the permittee operates the RICE under their own maintenance plan, the permittee must keep records of the maintenance.

**Permit Condition 6.11**

In accordance with 40 CFR 63.6640(b), the permittee must report each instance of deviation from the management practice standards.

[40 CFR 63.6640(b)]

**MRRR - (permit Condition 6.11)**

This permit condition states the permittee must maintain in a report of any deviation from the management practice standards.

**Permit Condition 6.12**

In accordance with 40 CFR 63.6645(a)(5), the permittee is subject to the General Requirements provided in Table 8 except for the notification requirements of 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

[40 CFR 63.6665, 63.6645(a)(5)]

**MRRR - (permit Condition 6.12)**

This permit conditions states the permittee is subject to the General Requirements within Table 8 with exception stated in the permit condition.

**5.3 General Provisions**

Unless expressly stated, there are no MRRR for the general provisions.

**General Compliance, Duty to Comply**

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

**General Compliance, Need to Halt or Reduce Activity Not a Defense**

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

**General Compliance, Duty to Supplement or Correct Application**

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

**Reopening, Additional Requirements, Material Mistakes, Etc.**

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[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)]

**Reopening, Permitting Actions**

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

## **Property Rights**

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**

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested 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, 4/5/00; 40 CFR 70.6(a)(6)(v)]

## **Information Requests, Confidential Business Information**

Upon request, the permittee must 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**

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

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

## **Changes Requiring Permit Revision or Notice**

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 must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; 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), and 70.7(d), (e)]

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 CAA, 42 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, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

## **Federal and State Enforceability**

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98; Idaho Code §39-108; 40 CFR 70.6(b)(1), (2)]

## **Inspection and Entry**

Upon presentation of credentials, the facility 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**

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

### **Fees**

The owner or operator of a Tier I source 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**

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**

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 owner or operator 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)]

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**

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 an owner or operator of a source 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, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;  
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

### **Compliance Schedule and Progress Reports**

- 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**

The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as specified.

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified;
- 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, 4/6/05; 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**

The permittee may not make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

### **No Tampering**

The permittee may not render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

### **Semiannual Monitoring Reports.**

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 as specified.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

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

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures.

taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report  
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

#### **Permit Revision Not Required, Emissions Trading**

No permit revision will 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, 4/5/00; 40 CFR 70.6(a)(8)]

#### **Emergency**

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, 4/5/00; 40 CFR 70.6(g)]

## **6. REGULATORY REVIEW**

### **6.1 Attainment Designation (40 CFR 81.313)**

The facility is located in Idaho County which is designated as attainment or unclassifiable for PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>2</sub>, SO<sub>2</sub>, and Ozone. Reference 40 CFR 81.313.

### **6.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)**

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

The facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for CO, NO<sub>x</sub>, VOC and GHG as demonstrated previously in the Emissions Inventories Section. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10.

### **6.3 PSD Classification (40 CFR 52.21)**

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is not classified as an existing major stationary source, because the estimated emissions of PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOCs, have the potential not to exceed major stationary source thresholds of 250 tons per year.

The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a). This facility is not a major source as defined to have potential emissions that exceed 250 tons per year of a criteria pollutant. The PSD classification does not apply to this facility.

### **6.4 NSPS Applicability (40 CFR 60)**

The facility has a boiler subject to 40 CFR 60 subpart D, thus the facility is subject to Subpart Db and 40 CFR 60 Subpart A for the Wellons hog fuel boiler.

### **6.5 NESHAP Applicability (40 CFR 61)**

The facility is not subject to any NESHAP requirements in 40 CFR 61.

**6.6 MACT Applicability (40 CFR 63)**

Engines located at major sources of HAP are subject to standards determined by maximum achievable control technology, whereas engines located at area sources are subject to generally achievable control technology (GACT). The IFG facility is a synthetic area source with respect to HAP because it is limited to less than 10 tons per year (tpy) of a single HAP and less than 25 tpy of total HAP. Consequently, the fire pump engine is classified as an existing stationary engine under 300 hp located at an area source of HAP and must comply with the following requirements:

The engine identified above must comply with the applicable requirements of NESHAP ZZZZ before May 3rd, 2013.

[40 CFR 63.6595(a)]

The permittee shall change the oil and filter every 1000 hours of operation or annually, whichever comes first or at a frequency determined by an oil sample and analysis program as follows:

- Sample and analyze the oil annually or every 1000 hours of operation, whichever comes first to determine total base number, viscosity and water content by volume.
- If one or more of the following condemning limits for these parameters is exceeded then the permittee is required to change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation then the permittee must change the oil within 2 days of receiving the results or before commencing operation, whichever is later.
  - Total Base Number is less than 30% of the Total Base Number when the oil is new.
  - Viscosity of the oil has changed by more than 20% from the viscosity of the oil when new.
  - Percent Water Content (by volume) is greater than 0.5.
- The permittee must keep records of the oil analysis results and the oil and filter changes for the engine.

[40 CFR 63.6603 Table 2d, 63.6625(i)]

The permittee shall inspect air cleaners every 1,000 hours of operation or annually, whichever comes first.

[40 CFR 63.6603 Table 2d]

The permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6603 Table 2d]

The permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must ensure, to the extent practicable, the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e)]

The permittee must minimize the engine's time spent at idle and at startup to a period needed for appropriate and safe loading, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

[40 CFR 63.6625(h)]

The permittee must be in compliance with the preceding management practice standards at all times as well as maintaining and operating any affected source in a manner consistent with safety and good air pollution control.

[40 CFR 63.6605(a-b)]

The permittee must demonstrate compliance with the preceding management practice standards by operating and maintaining the stationary RICE according to the manufacturer's emission-related instructions or by developing and following their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice.

[40 CFR 63.6640(a), Table 6]

The permittee must report each instance of deviation from the management practice standards.

[40 CFR 63.6640(b)]

Each instance in which the unit did not meet the requirements of the applicable general provisions listed in Table 8 of this subpart must be recorded.

[40 CFR 63.6640(e)]

If the permittee follows their maintenance plan rather than the manufacturer's written instructions they must keep records of maintenance conducted on the stationary RICE.

[40 CFR 63.6655(e)]

The permittee is subject to the General Requirements provided in Table 8 except for the notification requirements of 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g)and (h).

[40 CFR 63.6665, 63.6645(a)(5)]

## **Boiler NESHAPS**

EPA promulgated NESHAP for Area Sources: Industrial, Commercial, and Institutional Boilers (NESHAP Subpart JJJJJ) on March 21, 2011, and subsequently signed a notice of reconsideration of the rule on December 2, 2011. IFG's hog fuel-fired boiler is classified as an existing boiler designed to burn biomass/bio-based solid located at an area source HAP and is therefore subject to work practice standards that include performing initial and subsequent tune-ups. Due to the reconsideration of the rule, which will affect certain deadlines, and the lack of qualified technicians to perform tune-ups, EPA has issued two No Action Assurance letters saying that they will use their enforcement discretion to not enforce violations of conducting the annual tune up and submitting a notice of compliance (due March and July 2012 respectively).

IFG has performed its initial tune-up and has submitted a notice of compliance for the boiler.

### **IFG's boiler is subject to the following NESHAP JJJJJ requirements:**

The permittee must conduct the initial tune-up no later than March 21, 2014.

[40 CFR 63.1 1196(a)]

The permittee must conduct the energy assessment no later than March 21, 2014.

[40 CFR 63.11 196(a)]

The permittee must conduct a tune-up of the boiler biennially. Each biennial tune-up specified must be conducted no more than 25 months after the previous tune-up. The permittee must conduct the tune-up while burning the type of fuel that provided the majority of the heat input to the boiler over the 12 months prior. The management practices in Table 2 apply at all times.

[40 CFR 63 Subpart JJJJJ, Table 2, 63.1 1201(b), (d); 63. 11223(a)]

The permittee must conduct a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include:

- A visual inspection of the boiler or process heater system.
- An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,
- An inventory of major energy consuming systems,
- A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
- A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices,
- A list of major energy conservation measures,
- A list of the energy savings potential of the energy conservation measures identified, and
- A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
- The energy assessment will be 8 on-site technical labor hours in length maximum, but may be longer at the discretion of the owner or operator of the affected source. The boiler system(s) and any on-site energy use system(s) accounting for at least 50 percent of the affected boiler(s) energy ( e.g., steam, hot water, or electricity) production, as applicable, will be evaluated to identify energy savings opportunities, within the limit of performing an 8-hour energy assessment.

The permittee must operate and maintain the unit in a manner consistent with safety and good air pollution control practices for minimizing emissions.

[40 CFR 63.11205(a)]

The permittee must demonstrate initial compliance with the work practice standard and management practice above by the dates listed above.

[40 CFR 63.11210(c)]

The permittee must conduct a tune-up and submit a signed statement in the Notification of Compliance Status report that indicates that the tune-up has been completed.

[40 CFR 63.11214(b)]

The permittee must submit a signed certification in the Notification of Compliance Status report that indicates that an energy assessment of the boiler and energy use system has been completed and submit, upon request, the energy assessment report.

[40 CFR 63.11214(c)]

The permittee must conduct a tune-up of the boiler or process heater biennially to demonstrate continuous compliance as follows:

- As applicable, inspect the burner, and clean or replace any components of the burner as necessary ( you may delay the burner inspection until the next scheduled unit shutdown, but you inspect each burner at least every 36 months);
- 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;
- Optimize total emissions of carbon monoxide. This optimization should be consistent with manufacturer's specifications, if available;
- Measure the concentrations in the effluent stream of carbon monoxide 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 the Administrator, a biennial report containing the following information:
  - The concentrations of carbon monoxide in the effluent stream in part per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler;
  - A description of any corrective actions taken as a part of the combustion adjustment; and
  - The type and amount of fuel used over the 12 month prior to the biennial tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period.
- If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

The permittee must submit an initial notification as specified in §63.9(b)(2) not later than 120 days after May 20, 2014.

The permittee must submit a Notification of Compliance Status in accordance with 40 CFR 63.9(h) no later than 120 days after the applicable compliance dates for tune-ups and energy assessment listed above (EPA will not enforce violation of this deadline). In addition to the information required in 40 CFR 63.9(h)(2) the notification must include the following statements, as applicable:

- "This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler."
- "This facility has had an energy assessment performed according to §63.11214(c)."

The permittee must prepare by March 1 of every other year, and submit to the delegated authority upon request, a biennial compliance certification report. If there are any instances of deviations from the applicable requirements during the reporting period, the permittee must submit the report by March 15. The report must include the following:

- Company name and address.
- Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.
- If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

The permittee must keep the following records:

- Copies of each notification and report submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status.
- Records of the date of each tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
- Copy of energy assessment report.
- Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment
- Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in Section 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

Records must be in a form suitable and readily available for expeditious review. Records must be kept for 5 years, two of which must be on-site. Records may be kept off-site for the remaining three years.

#### **6.7 CAM Applicability (40 CFR 64)**

Individual permit units at facilities that are subject to Title V permitting requirements (Tier I permits) may be subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). 40 CFR Part 64 requires CAM for units that meet the following three criteria:

- 1) The unit must have an emission limit for the pollutant;
- 2) The unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) The unit must have a pre-control potential to emit of greater than the major source thresholds.

At this facility the Cogeneration Boiler, has an emissions limit as well as add-on controls for PM<sub>10</sub> emissions. As part of this project the facility submitted CAM operational procedures and limits. These are stated in Table 7.1 of the permit. Permit Conditions 7.1 through 7.11 states the recordkeeping that Idaho Forest Group LLC will be doing to demonstrate continuous compliance with the 40 CFR 64.

#### **6.8 Acid Rain Permit (40 CFR 72-75)**

Idaho Forest Group LLC is not subject to 40 CFR 72-75.

### **7. PUBLIC COMMENT**

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from April 24, 2013 to May 24, 2013. During this time, a comment was submitted in response to DEQ's proposed action. The comment was submitted by IFG via phone initially but the comment was later sent by email to the permit writer and can be found in the attached Response to Comments document. A response to public comments document has been crafted by DEQ based on comments submitted during the public comment period. That document is part of the final permit package for this permitting action.

### **8. EPA REVIEW OF PROPOSED PERMIT**

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on June 18, 2013 via e-mail. On July 11, 2013, EPA Region 10 responded to DEQ via e-mail indicating the permit is now eligible for issuance.

## Appendix A - Emissions Inventory

Table 5-1 Potential Emissions Under the Tier 1 Operating Permit

	Source	PM (ton/yr)	PM 10 (tons/yr)	PM 2.5 (tons/yr)	VOC's (tons/yr)	S02 (tons/yr)	CO (tons/yr)	NOx (tons/yr)	Lead (tons/yr)	HAPs (tons/yr)
Point	Boiler	59	29	26	25	13	101	127	0.02	19
Point	CY11 (BAGHOUSE)	0.040	0.040	0.022	NA	NA	NA	NA	NA	NA
Point	CY12	2.63	2.10	1.17	NA	NA	NA	NA	NA	NA
Point	CY41	0.003	0.002	0.001	NA	NA	NA	NA	NA	NA
Point	CY71	1.15	0.58	0.32	NA	NA	NA	NA	NA	NA
Point	CY72 (BAGHOUSE)	0.04	0.04	0.02	NA	NA	NA	NA	NA	NA
Point	CY73	2.68	1.34	0.75	NA	NA	NA	NA	NA	NA
Point	CY74	0.37	0.30	0.17	NA	NA	NA	NA	NA	NA
Point	CY75	0.47	0.37	0.21	NA	NA	NA	NA	NA	NA
Point	Kilns	6	6	6	175.00	NA	NA	NA	NA	17.4
Point	Fire Water Pump	0.00	0.00	0.00	0.00	0.00	0.02	0.58	0.00	0.24
Point	Exempt Waste Oil Heater	1.19	1.52	1.11	0.01	16.01	0.03	0.24	0.41	0.00
	SUBTOTALS	75	41	36	200	29	101	128	0.4	37
Fugitive	Other Processes (sawing, ...)	2.6	1.36	0.76	NA	NA	NA	NA	NA	NA
Fugitive	Transfer -Drops, Conveyors	0.00	0.00	0.00	NA	NA	NA	NA	NA	NA
Fugitive	Storage	0.08	0.00	0.00	0.004	NA	NA	NA	NA	NA
Fugitive	Vehicle Traffic	48.59	8.21	1.65	NA	NA	NA	NA	NA	NA
	TOTALS	126	51	39	200	29	101	128	0.4	37

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## **Appendix B - Facility Comments for Draft Permit**

**The following are comments IFG made to the draft permit sent by DEQ to IFG.**

**Permit Comments**

**Facility comment:** Concerning PC 25 regarding a missing part of the permit condition that was in previous Tier I operating permit but not in this draft permit.

**DEQ response:** The missing part of the previous permit condition has been added to this permit.

**Facility comment:** Regarding PC 3.28 and the 30 days to submit a compliance test report for required performance testing.

**DEQ response:** The IDAPA rule for reporting stated in IDAPA 58.01.01.157 is indeed 30 days. A discussion with staff indicates this rule still applies. However some reports do infact require more time and DEQ request any facility that requires the extra time is to contact DEQ to make a time extension request. DEQ is looking into the possibility to have the Rule modified to address the extra time needed to perform the test analysis and report.

**Facility comment:** Facility requested the boiler steaming limit to be inserted in Table 4.2.

**DEQ response:** The boiler steaming limit has been inserted in Table 4.2.

**Facility comment:** Facility had additional citations, and additional statement regarding PCs 4.8, 4.9, and 4.10.

**DEQ response:** The additional citations and additional statement to PCs 4.8, 4.9, and 4.10 have been added.

**Facility comment:** Facility comments for PC 4.10 is for the insertion of new language regarding the recent change in the regulation.

**DEQ response:** the lanuage of "The permittee must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include:" was added to replace the previous regulation language.

**Facility comment:** PC 4.11 The facility commented the highlighted language was for a major source boiler energy assessment.

**DEQ response:** The language highlighted by the facility has been deleted from the permit.

**Facility comment:** PC 4.11 The facility added the new language from the regulation "The energy assessment will be 8 on-site technical labor hours in length maximum, but may be longer at the discretion of the owner or operator of the affected source. The boiler system(s) and any on-site energy use system(s) accounting for at least 50 percent of the affected boiler(s) energy ( e.g., steam, hot water, or electricity) production, as applicable, will be evaluated to identify energy savings opportunities, within the limit of performing an 8-hour energy assessment."

**DEQ response:** The new regulation language has been added to the permit with its citations.

**Facility comment:** PC 4.14 The new regulation language "Measurements may be taken using a portable CO analyzer;" "but only if the unit was physically and legally capable of using more than one type of fuel during that period" and "30 days" needed to be added to PC 4.14.

**DEQ response:** The new regulation language has been added were appropriate to PC 4.14.

**Facility comment:** PC 4.19 The facility comments concerned adding new regulation language to PC 4.19.

**DEQ response:** The new regulation language was added to PC 4.19.

**Facility comment:** PC 4.22 The language from the previous permit “The permittee must conduct a tune-up and submit a signed statement in the Notification of Compliance Status report that indicates that the tune-up has been completed” was not stated in the draft permit, facility requested the condition to be stated in new permit.

**DEQ response:** The old permit condition will be stated in the new permit.

**Facility comment:** PC 4.24 The facility requested the following language be added to this permit condition “The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ( [www.epa.gov/cdx](http://www.epa.gov/cdx) ). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in § 63.13.”

**DEQ response:** The requested language will be added to the new permit.

**Facility comment:** PC 4.26 regarding the change from 30 days to 60 days for the compliance test report.

**DEQ response:** same as reponse to PC 3.28 “The IDAPA rule for reporting stated in IDAPA 58.01.01.157 is indeed 30 days. A discussion with staff indicates this rule still applies. However some reports do infact require more time and DEQ request any facility that requires the extra time is to contact DEQ to make a time extension request. DEQ is looking into the possibility to have the Rule modified to address the extra time needed to perform the test analysis and report.”

**Facility comment:** Table 5.2 facility requested to added the kiln throughput to the summary table.

**DEQ response:** The kiln throughput will be added to the summary table 5.2.

**Facility comment:** PC 5.7 “Here and in condition 5.8: I insert the word "format" because although the equation is fine in condition 5.6 it defines Yi as the methanol emission factor and we shouldn't use that to calculate total haps or formaldehyde emissions”

**DEQ response:** The word “format” has been added to PC 5.7 and PC 5.8 for clarification.

**Facility comment:** PC 6.2 changing the hours for oil and filter changes and oil analysis from every 500 hours to 1000 hours to coincide with the new regulation.

**DEQ response:** The 1000 hour reference will be in the new permit.

**Facility comment:** PC 6.2, 6.3, 6.4 adding addition citations.

**DEQ response:** The additional citations will be in the new permit.

**Facility comment:** Table 7.1 concerning the Indicator Range and Averaging Period for the Compliance assurance requirements for the emission unit.

**DEQ response:** The newly submitted indicator ranges and the averaging period from the draft permit response will be in the new permit.

### **Statement of Basis (SOB) Comments**

**Facility comment:** The facility commented on an error found in table 5.5 regarding emission quantities.

**DEQ response:** These errors have been corrected and the corrected number will be in the final SOB.

**Facility comment:** PC 4.25 regarding reporting “We submit a Tier I report every January, would this be something different?”

**DEQ response:** If the January report has the same information requested in it, it would be assumed one report would be needed. However, ask for written confirmation when sending in the next January report from the person receiving the report that the January report does indeed fulfill the regulation stated in PC 4.25.

**The rest of the comments submitted by the facility were directly related to the comments regarding the permit and were addressed by DEQ in the permit comment and response section .**

### **Comments and Responses regarding the second draft permit and statement of basis.**

#### **Statement of Basis Comments**

**Facility comment:** PC 4.6.4 Please Remove this Section since it has been removed from our permit.

**DEQ response:** This permit section of the permit has been removed.

**Facility comment:** PC 4.14 Where it says “As applicable” I would just like to confirm that this requirement would not apply to our wood fired boiler since we do not have a “burner”.

**DEQ response:** For the two comments regarding the term burner, “as applicable” means if the boiler has a burner the specified requirements would apply, if the boiler does not have specific burner the requirement would not apply.

**Facility comments:** The facility had several comments regarding a specific permit condition number.

**DEQ response:** The specific number has been dropped. Instead the verbage use was permit condition, or permit condition with in this permit, or emission standard within this permit.

**Facility comments:** PC 4.26 Do the following listed IDEQ Air Quality Division Stationary Source Program forms that I submit by January 30th for Permit Condition 3.30 also meet all of the requirements for Permit Condition 4.26?

FORM AQ-C1

FORM AQ-C2

FORM AQ-C3

FORM AQ-C4

FORM AQ-C5

**DEQ response:** If the information supplied to the department by the facility in the January forms required by Permit Condition 3.30 regarding the semi and annual compliance certifications in the General Provisions of the permit is the same, the reporting is sufficient.

**Facility comment:** Boiler NESHAPS section regarding PC 4.11, Does not Match Section 4.11 in the Permit.

**DEQ response:** This section has been corrected to match PC 4.11.

**Facility comment:** PC 4.18, We do not have a “burner”.... But the main reason for the comment here is that these do not match section 4.14 of the Permit.

**DEQ response:** These permit conditions has been corrected to match PC 4.18.

**Facility comment:** PC 4.19, This does not match section 4.19 of the permit.

**DEQ response:** These permit conditions has been corrected to match PC 4.19.

**Facility comment:** This would be the end of my request to review this a little closer from the start of Section 6.6.

**DEQ response:** Additional review has shown the last two statements in the boiler NESHAPs section were no longer in the permit. These two statements were removed from the statement of basis.