

Statement of Basis

**Permit to Construct No. P-2013.0064
Project ID 61310**

**Idaho Veneer Company
Post Falls, Idaho**

Facility ID 055-00004

Final

**March 25, 2015
Robert Baldwin
Permit Writer**

A handwritten signature in black ink, appearing to read 'R. Baldwin', is written over the printed name 'Robert Baldwin'.

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
Btu	British thermal units
CAA	Clean Air Act
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O ₂	oxygen
PC	permit condition
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
VOC	volatile organic compounds
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

Idaho Veneer Company (Idaho Veneer) is located in Post Falls, Idaho and produces veneer and board lumber. The facility includes a wood/bark-fired hog fuel boiler which produces steam to heat the steam chambers, dry kilns, and veneer dryers; a standby gas-fired boiler to heat the Cremona veneer dryer and steam chambers; two lumber dry kilns; cyclones controlling the planer and transfer of sawdust and hog fuel; wood byproduct storage and loadout; and one veneer dryer.

The facility is primarily a cant and tie mill. Logs are first debarked in one of two debarkers. Rotary veneer is produced by conditioning the wood in steam chambers, turning the logs on a lathe, and drying the veneer in a Cremona dryer. Smaller, thin veneer is produced by squaring the logs (called cants) with a band saw, conditioning the cants in steam chambers, processing through one of four slicers, and drying in a Cremona dryer. Steam is produced by a Cleaver Brooks 13,800 pound steam per hour NG fired boiler and a Wellons 40,000 pound steam per hour hog fuel fired boiler. Boards can be produced from the portions of wood cut off during the initial cutting for the veneer process and from logs that are not veneer grade. That material goes through various sawing and trimming operations, is dried in one of two steam-heated dry kilns, planed to final dimension, trimmed to length, and shipped out via truck.

Permitting History

The following 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).

December 24, 1993	A PTC was issued for the installation of the Cremona veneer dryer, which was revised and reissued on June 11, 1998, Permit status (S)
February 13, 1998	PTC was issued for the lumber dry kilns. Permit status (S)
February 20, 2003	PTC/Tier II was issued to incorporate the requirements of existing permits, to limit the facility emissions to below major facility classification and to protect ambient air quality standards. Permit status (S)
December 23, 2008	PTC/Tier II Operating Permit No. T2-2008.0115 was issued to modify the existing PTC/Tier II permit to adequately address the current emission units and the emissions produced from these units emitted into the air for the facility. Permit status (S)
August 22, 2013	PTC/Tier II Operating Permit No. T2-2008.0115 was issued to renew the existing Permit to Construct (PTC) and Tier II operating permit (Tier II) and to revise the terms of the permit to more accurately address the conditions of the facility's operations. In addition, the permit was revised <i>on August 22, 2013</i> to incorporate the results of the September 2012 source test. Permit status (A, but will become S upon issuance of this permit).

Application Scope

This PTC is for a minor modification at an existing minor facility, and also converts a PTC/Tier II combo permit to a PTC because the requested changes make all permit conditions PTC-applicable.

The applicant has proposed to use the facility's Cleaver Brooks NG fired boiler as their primary steam producer, and switch the Wellons 40,000 pounds steam per hour hog fuel fired boiler, previously the primary boiler, into a supporting or backup role. Making this change will modify all permit conditions such that they are PTC requirements, and not Tier II requirements, eliminating the need for a combo permit. Therefore, the permit will be issued as a PTC and will no longer require a Tier II component.

Application Chronology

December 20, 2013	DEQ received an application
December 23, 2013	DEQ received an application fee.
January 6 – January 21, 2014	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
March 3, 2014	DEQ determined that the application was incomplete.
May 27, 2014	DEQ received supplemental information from the applicant.
August 7, 2014	DEQ determined that the application was complete.
October 6, 2014	DEQ made available the draft permit and statement of basis for peer and regional office review.
October 6, 2014	DEQ made available the draft permit and statement of basis for applicant review.
January 20 – March 2, 2015	DEQ provided a public comment period on the proposed action.
March 20, 2015	DEQ received the permit processing fee.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emission Point ID No.
B-1	<u>Wellons Boiler</u> Manufacturer: Wellons Rated capacity: 40,000 lbs of steam/hr Installed: 1976 Burner type: Fuel cell Fuels: wood fired	<u>Multiclone</u>	B-1
B-2	<u>Cleaver Brooks Stand by Boiler</u> Manufacturer: Cleaver Brooks Rated heat capacity: 13.2 MMlbs steam/hr Installed: 1971 Fuels: Natural gas	None	B-2
B-3	<u>Thermopack Boiler</u> Manufacturer: Thermopack Rated heat capacity: 600,000 Btu/hr Installed: 1980 Fuels: Natural gas	None	B-3
P-10 A-C & P-11 A-C	<u>Wellons Dry Kiln No. 1 and Coe Dry Kiln No. 2</u> Size rated: 1370 bdf/hr each	None	P-10 A-C & P-11 A-C
P-1	<u>Cremona Dryer</u> Rating: 10,000 ft ² /hr (3/8" veneer) Steam Chambers (6)	None	P-1
P-21 P-38 AND P-55 P-39 P-13 P-14 P-14 P-17	<u>Cyclones</u> Hog Fuel Cyclone (P21) Planer Cyclone No.1 and No. 2 (P-38 and P-55) Sawdust Cyclone (P-39) Jointer Cyclone (P-13) Resaw Cyclone (P-14) Hog Overs Cyclone (P-16) Sawmill Chipper Cyclone (P-17)	None None	P-21 P-38 AND P-55 P-39 P-13 P-14 P-16 P-17

Emissions Inventories

Potential to Emit

IDAPA 58.01.01 defines Potential to Emit 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 hours 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 emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the Idaho Veneer from the prior permitted limits regarding the same sources.

Pre-Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project and the prior permit to construct/ Tier II operating permit that was issued on August 22, 2013.

The following table presents the pre-project potential to emit for all criteria from all emissions units at the facility and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 2 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Wellens boiler	6.9	28.98	0.54	1.89	4.74	16.6	12.94	45.27	0.37	1.28
Cleaver Brooks boiler	0.078	0.057	0.006	0.005	1.03	0.75	0.86	0.63	0.056	0.04
Thermopack boiler	0.026	0.19	0.002	0.005	0.34	0.25	0.287	0.21	0.19	0.014
Kilns, Dryer, Steam Chambers	0.00	8.6	0.00	0.00	0.00	0.00	0.00	0.00	0.00	14.2
Combined Cyclones	0.00	1.7	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pre-Project Totals	7.00	39.53	0.55	1.90	6.11	17.60	14.09	46.11	0.62	15.53

a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.

b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

Post Project Potential to Emit

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility's classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria from all emissions units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 3 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Wellons Boiler	6.9	16.1	0.54	1.26	4.74	11.1	12.94	30.2	0.37	0.85
Cleaver Brooks and Thermopack boilers combined	0.11	0.18	0.01	0.01	1.4	2.4	1.18	2.02	0.07	0.13
Kilns, Dryer, Steam Chambers	0.00	8.6	0.00	0.00	0.00	0.00	0.00	0.00	0.00	14.2
Combined Cyclones	0.00	1.7	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Post Project Totals	7.01	26.58	0.55	1.27	6.14	13.50	14.12	32.22	0.44	15.18

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
 b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

Table 4 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	7.00	39.53	0.55	1.90	6.11	17.60	14.09	46.11	0.62	15.53
Post Project Potential to Emit	7.01	26.58	0.55	1.27	6.14	13.50	14.12	32.22	0.44	15.18
Changes in Potential to Emit	-0.01	-12.95	0.00	-0.63	0.03	-4.1	0.03	-13.89	-0.18	-0.35

Non-Carcinogenic TAP Emissions

Non Carcinogenic TAP emissions and Carcinogenic HAP emissions are illustrated in Appendix A Emissions inventory.

Ambient Air Quality Impact Analyses

No ambient air quality impact analysis was required because the modification was an overall reduction of pollutants and no threshold increases were achieved to trigger such an analysis.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Kootenai County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

“Synthetic Minor” classification for criteria pollutants is defined as the uncontrolled Potential to Emit for criteria pollutants are above the applicable major source thresholds and the Potential to Emit for criteria pollutants fall below the applicable major source thresholds.

This facility has previously been determined to be a synthetic minor facility. Therefore, because there are no changes to equipment, and emissions have been decreased, this SOB does not require that the SM classification be reanalyzed.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the veneer and board lumber facility. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400-410 were not applicable to this permitting action.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625Visible Emissions

The sources of PM₁₀ emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.7 and 2.8.

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

IDAPA 58.01.01.301Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM₁₀, SO₂, NO_x, CO, VOC, and HAP or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The facility has no generators, so 40 CFR 60 Subpart IIII does not apply.

The facility has three boilers. Subparts Db and Dc are potentially applicable.

The Wellons boiler is wood-fired, was installed in 1976, and is calculated to be rated at 60.9 MMBtu/hr.

The Cleaver Brooks boiler is NG fired, was installed in 1971, and is rated at 4.94 MMBtu/hr.

The Thermopack boiler is NG fired, was installed in 1980, and is rated at 0.6 MMBtu/hr.

Subpart Db applies to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984. None of these boilers meet the criteria. Therefore, Subpart Db does not apply.

Subpart Dc applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989. These boilers were all constructed prior to that date. Therefore, Subpart Dc does not apply.

NESHAP Applicability (40 CFR 61)

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

MACT Applicability (40 CFR 63)

40 CFR Subpart DDDD, Idaho Veneer does not meet both criteria required to be subject to Subpart DDDD because Idaho Veneer is not a major source of HAP emissions.

EPA promulgated final NESHAP for Area Sources: Industrial, Commercial, and Institutional Boilers (NESHAP Subpart JJJJJ) on December 21, 2012. Idaho Veneer's hog fuel-fired boiler is classified as an existing boiler designed to burn wood waste solid fuel located at an area source of HAP and is therefore subject to work practice standards that include performing initial and subsequent tune-ups.

Permit Conditions Review

Existing Permit Condition 2.11

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

MRRR – (Permit condition 2.11)

This permit is a permit to construct and not a permit to construct/ Tier II operating permit, the reference to a Tier II operating permit was removed.

Permit Condition 3.3

The PM, PM₁₀, SO₂, NO_x, CO, and VOC emissions from the boiler's stacks shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 BOILERS EMISSIONS LIMITS

Source Description	PM		PM ₁₀		PM _{2.5}		SO ₂		NO _x		VOC		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Wellons boiler ^a	13.8	32.2	6.9	16.1	4.1	11.49	0.54	1.26	4.74	11.1	0.37	0.85	12.94	30.2
48 MM cubic feet of natural gas combusted annually by Cleaver Brooks and Thermopack boilers combined	0.11	0.18	0.11	0.18	0.11	0.18	0.01	0.01	1.4	2.4	0.07	0.13	1.18	2.02

^a Wellons boiler combust 10,000 green tons per year of wood waste and bark.

^b Cleaver Brooks and Thermopack boilers combust 48 MM cubic feet of natural gas annually

MRRR – (Permit Condition 3.3)

This permit condition was revised to reflect the emissions changes for the sources regarding the reduction of woodwaste to be combusted and the increase in natural gas to be combusted yearly. The natural gas is total gas used by the two natural gas boiler and not separated as in the previous permit.

Permit Condition 3.7

In accordance with 40 CFR 63.11196(a)(1), if the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management practice standard no later than March 21, 2014.

[40 CFR 63.11196(a)(1)]

MRRR- (Permit Condition 3.7)

This permit condition addresses the compliance dates for the facility to demonstrate compliance with 40 CFR 63.11196(a)(1).

Permit Condition 3.8

In accordance with 40 CFR 63.11196(a)(3), if the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014.

[40 CFR 63.11196(a)(3)]

MRRR- (Permit Condition 3.8)

This permit condition addresses the compliance dates for the facility to demonstrate compliance with 40 CFR 63.11196(a)(3).

Permit Condition 3.9

In accordance with 40 CFR 63.11201(b), you must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 to this subpart satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement.

[40CFR63.11201(b)]

MRRR – (Permit Condition 3.9)

This permit condition addresses the work practice standards, emission reduction measure and management practices specified in Table 2 the facility would comply with to demonstrate compliance with Permit Condition 3.9.

Permit Condition 3.10

In accordance with 40 CFR 63.11201(d), these standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time you must comply only with Table 2 to this subpart.

[40CFR63.11201(d)]

MRRR- (Permit Condition 3.10)

This permit condition addresses the work practices and energy assessment required to demonstrate compliance with 40 CFR 63.11201.

Permit Condition 3.11

In accordance with 40 CFR 63.11205(a), at all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.11205(a)]

MRRR – (Permit Condition 3.11)

This permit condition addresses the general requirement required to demonstrate compliance with 40 CFR 63.11205.

Permit Condition 3.12

In accordance with 40 CFR 63.11210(c), For existing affected boilers that have applicable work practice standards, management practices, or emission reduction measures, you must demonstrate initial compliance no later than the compliance date that is specified in §63.11196 and according to the applicable provisions in §63.7(a)(2), except as provided in paragraph (j) of this section.

In accordance with 40 CFR 63.11210 (i) For boilers located at existing major sources of HAP that limit their potential to emit (e.g., make a physical change or take a permit limit) such that the existing major source becomes an area source, you must comply with the applicable provisions as specified in paragraphs (i)(1) through (3) of this section.

[40 CFR 63.11210 (i)]

MRRR – (Permit Condition 3.12)

This permit condition addresses the facility must demonstrate compliance no later than the compliance date stated in section 63.11196, the paragraphs (i) (1) through (3) since the facility declares itself an area source.

Permit condition 3.13

In accordance with 40 CFR 63.11210(i)(1), Any such existing boiler at the existing source must demonstrate compliance with subpart JJJJJ within 180 days of the later of March 21, 2014 or upon the existing major source commencing operation as an area source.

MRRR – (Permit Condition 3.13)

This permit condition addresses the calendar timeline the existing boiler must demonstrate compliance with subpart JJJJJ when a existing major source commences operation as an area source.

Permit Condition 3.14

In accordance with 40 CFR 63.11210(i)(2) Any new or reconstructed boiler at the existing source must demonstrate compliance with subpart JJJJJ within 180 days of the later of March 21, 2011 or startup.

MRRR – (Permit Condition 3.14)

This permit condition addresses the calendar timeline that any new or reconstructed boiler at an existing source must demonstrate compliance with subpart JJJJJ.

Permit Condition 3.15

In accordance with 40 CFR 63.11210(i)(3) Notification of such changes must be submitted according to §63.11225(g).

[40 CFR 63.11210 (i)]

MRRR – (Permit Condition 3.15)

This permit condition addresses the method that notification of changes must be submitted to demonstrate compliance with permit condition 3.15.

Permit Condition 3.16

In accordance with 40 CFR 63.11214(b), if you own or operate an existing or new biomass-fired boiler or an existing or new oil-fired boiler, you must conduct a performance tune-up according to §63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

[40 CFR 63.11214(b)]

MRRR – (Permit Condition 3.15)

This permit condition addresses need of a performance tune-up according to 63.11223(b) that would demonstrate compliance with permit condition 3.15 regarding an existing or new biomass fired or an existing or new oil fired boiler.

Permit Condition 3.17

In accordance with 40 CFR 63.11223(a), in accordance with 40 CFR 63.11223(a), for affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a performance tune-up according to paragraph (b) of this section and keep records as required in §63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.

[40 CFR 63.11223(a)]

MRRR – (Permit Condition 3.17)

This permit condition addresses the management practices and the records required to demonstrate compliance with the required performance tune-ups.

Permit Condition 3.18

In accordance with 40 CFR 63.11223(b), except as specified in paragraphs (c) through (f) of this section, you must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of this section. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler.

- (1) 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, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.
- (2) 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.
- (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.
- (4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- (5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- (6) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of this section.
 - (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
 - (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
 - (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- (7) 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 3.18)

This permit condition addresses the requirements for the facility to demonstrate the continuous compliance with the work practice and management practice standards required within this condition and by other permit conditions of this permit.

Permit Condition 3.19

Same as permit condition 3.7 of the prior permit.

Permit Condition 3.20

Same as permit condition 3.8 of the prior permit.

Permit Condition 3.21

Same as permit condition 3.9 of the prior permit.

Permit Condition 3.22

Same as permit condition 3.10 of the prior permit.

Permit Condition 3.23

In accordance with 40 CFR 63.11225(a), you must submit the notifications specified in paragraphs (a)(1) through (5) of this section to the administrator.

- (1) You must submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of this section.
- (2) An Initial Notification must be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard.
- (3) If you are required to conduct a performance stack test you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance stack test is scheduled to begin.
- (4) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196 unless you must conduct a performance stack test. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official.

MRRR (Permit Condition 3.23)

This permit condition addresses the required notifications and the dates these notification to demonstrate compliance with the Permit Condition 3.23.

Permit Condition 3.24

In accordance with 40 CFR 63.11225(b), you must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of this section. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section. For boilers that are subject only to a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section.

- (1) Company name and address.

(2) Statement by a responsible official, with the official's name, title, phone number, email 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. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(i) "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."

3) 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.

MRRR (Permit Condition

This permit condition addresses the requirements and content the facility must present to demonstrate compliance with the permit condition 3.24.

Permit Condition 3.25

In accordance with 40 CFR 63.11225(c), you must maintain the records specified in paragraphs (c)(1) through (7) of this section.

(1)As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

(2)You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this section.

(i)Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturers specifications to which the boiler was tuned.

(iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.

(4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.

(5)Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §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.

MRRR (Permit Condition 3.25)

This permit condition addresses the facility to the type of records needed to demonstrate compliance with permit condition 3.25.

Permit Condition 3.26

In accordance with 40 CFR 63.11225(d), your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years.

MRRR (Permit Condition 3.26)

The permit addresses the requirement for the facility to demonstrate compliance with records management.

Permit Condition 3.27

In accordance with 40 CFR 63.11225(g), if you have switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within subpart JJJJJ, in the boiler becoming subject to subpart JJJJJ, or in the boiler switching out of subpart JJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to subpart JJJJJ, you must provide notice of the date upon which you switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:

- (1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.
- (2) The date upon which the fuel switch, physical change, or permit limit occurred.

[40 CFR 63.11225(g)]

MRRR – (Permit Condition 3.17)

This permit condition addresses the requirements for the facility to demonstrate compliance with the notification for any fuel changes.

Permit Condition 3.28

In accordance with 40 CFR 63.11226, in response to an action to enforce the standards set forth in §63.11201 you may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction, as defined at 40 CFR 63.2. Appropriate penalties may be assessed if you fail to meet your burden of proving all of the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief.

MRRR – (Permit Condition 3.28)

This permit condition addresses the facility may assert an affirmative defense to a claim for civil penalties for violations of standards that are caused by a malfunction as defined at 40 CFR 63.2.

Permit Condition 3.29

In accordance with 40 CFR 63.11226(a), assertion of affirmative defense. To establish the affirmative defense in any action to enforce such a standard, you must timely meet the reporting requirements in paragraph (b) of this section, and must prove by a preponderance of evidence that:

- (1) The violation: Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and
 - (ii) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and

(iii) Was not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
and

(2) Repairs were made as expeditiously as possible when a violation occurred; and

(3) The frequency, amount, and duration of the violation (including any bypass) were minimized to the maximum extent practicable; and

(4) If the violation resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and

(5) All possible steps were taken to minimize the impact of the violation on ambient air quality, the environment, and human health; and

(6) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and

(7) All of the actions in response to the violation were documented by properly signed, contemporaneous operating logs; and

(8) At all times, the affected source was operated in a manner consistent with good practices for minimizing emissions; and

(9) A written root cause analysis has been prepared, the purpose of which is to determine, correct, and eliminate the primary causes of the malfunction and the violation resulting from the malfunction event at issue. The analysis shall also specify, using best monitoring methods and engineering judgment, the amount of any emissions that were the result of the malfunction.

MRRR (Permit Condition 3.29)

This permit condition addresses the reporting requirements to establish an affirmative defense.

Permit Condition 3.30

In accordance with 40 CFR 63.11226(b) Report. The owner or operator seeking to assert an affirmative defense shall submit a written report to the Administrator with all necessary supporting documentation, that it has met the requirements set forth in paragraph (a) of this section. This affirmative defense report shall be included in the first periodic compliance, deviation report or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance, deviation report or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance, deviation report or excess emission report due after the initial occurrence of the violation of the relevant standard.

[40 CFR 63.11226 (b)]

MRRR – (Permit Condition 3.30)

This permit condition addresses the process the facility needs to perform to assert an affirmative defense to the Administrator.

GENERAL PROVISIONS

Initial Permit Condition 6.1

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

Initial Permit Condition 6.2

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 6.3

The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

Initial Permit Condition 6.4

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

Initial Permit Condition 6.5

The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

Initial Permit Condition 6.6

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

Initial Permit Condition 6.7

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

Initial Permit Condition 6.8

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

Initial Permit Condition 6.9

The performance test report provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

Initial Permit Condition 6.10

The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

Initial Permit Condition 6.11

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

Initial Permit Condition 6.12

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

Initial Permit Condition 6.13

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

Initial Permit Condition 6.14

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

Initial Permit Condition 6.15

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

Initial Permit Condition 6.16

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. **During this time, there was a comment on the application and there was a request for a public comment period on DEQ's proposed action.** Refer to the chronology for public comment opportunity dates. No comments were received during this public comment period.

Public Comment Period

A public comment period was made available to the public in accordance with IDAPA 58.01.01.209.01.c. During this time, comments were not submitted in response to DEQ's proposed action. Refer to the chronology for public comment period dates.

APPENDIX A – EMISSIONS INVENTORIES

Proposal:
 convert from a T2-PTC permit to a facility wide PTC permit
 reduce fuel combusted in Wellons boiler from 15,000 to 10,000 green tons per year
 increase the natural gas yearly consumption from 20 MM cubic feet to 48 MM cubic feet
 add the applicable federal requirements that apply to the boiler

Procedure:
 The lb/hr emission rate of the wellons boiler will remain unchanged, was set by
 prior permitting action.
 The PM_{2.5} emission will be determined using the same chart used in determining the
 other wellons boiler emission in 2008. the lb/hr emission will not be reduced
 as with the other wellons boiler hourly rates.
 The wellons boiler emissions were based on 5030.5 Btu/lb of green woodwaste.
 Previously at 15,000 green tons per year or 150,915 MM Btu/yr
 NOW at 10,000 green tons per year or 100,610 Btu/yr

Present Permitted Values for Wellons with the PM2.5 value included with the 20 excess as used before in 2008.

TABLE 1	PM		PM ₁₀		PM _{2.5}		SO ₂		NO _x		VOC		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
	13.8	48.3	6.9	24.15	4.1	17.24	0.54	1.89	4.74	16.6	0.37	1.28	12.94	45.27

Values Proposed with a reduction to 100,610 Btu/year and the operational hourly rates remain

TABLE 2	PM		PM ₁₀		PM _{2.5}		SO ₂		NO _x		VOC		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
	13.8	32.2	6.9	16.1	4.1	11.49	0.54	1.26	4.74	11.1	0.37	0.85	12.94	30.2

Yearly tonnage reduction of criteria pollutants. Row 26 minus row 31 tons per year only.

Decrease from wood burning reductions

reduced 16.1	reduced 8.05	reduced 5.75	reduced 0.63
reduced 15.07	reduced 5.5	reduced 0.43	reduced 15.07

NATURAL GAS USAGE AND INCREASE

The tons per year emissions will be calculated at the maximum gas volume stated in the facility's application for each emission unit

TABLE 6																				
		lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	T/yr
42	MMft ³ /yr	0.102	0.16	0.10	0.16	0.10	0.16	0.01	0.01	1.34	2.10	0.07	0.12	1.13	1.76					
6	MMft ³ /yr																			
	Thermopak	0.004	0.02	0.004	0.02	0.004	0.02	0.0004	0.002	0.06	0.30	0.003	0.02	0.05	0.25					

Change in lb/hr emissions rates from the corrected permit limits and the proposed emission limits is zero. Both when operating at their rated capacity.

Thus no modeling from an hourly rate increase because the hourly emissions rate are the same.

Change in the tons per year for each criteria as indicated above is an overall decrease for each criteria pollutant.

Thus no modeling from a ton per year because the criteria pollutants decreased in the tons per year emissions

A review of the present and proposed change to TAPS and HAPS compounds does not indicate a modeling or trigger to a regulation.

TOTAL EMISSIONS (tons/yr)

Source	PM	PM 10	PM2.5	VOC's	SO2	CO	NOx	Total HAPs	Methane	Methanol	Formald	Acet alde hyde
Process	9.58	7.58	6.68	14.11	0.00	0.37	0.00	13.4177	0.0000	1.3948	0.1311	0.2499
Fuel Storage	0.00	0.00	0.00	0.05	0.00	0.00	0.00	0.0000				
Storage	0.82	0.40	0.20	0.00	0.00	0.00	0.00					
Transfer	0.34	0.12	0.04	0.00	0.00	0.00	0.00					
Boilers proposed	6.91	6.74	6.64	1.49	0.88	22.84	10.04	0.8418				
Boilers currently permitted	10.17	9.91	9.76	2.09	1.31	32.08	12.45	1.2136	1.0934		0.2298	0.0432
Boilers proposed change	-3.26	-3.17	-3.12	-0.60	0.43	-9.24	-2.42	-0.3718	-0.3645		-0.0753	-0.0144

TOTAL proposed	17.65	14.84	13.56	15.64	0.88	23.22	10.04	14.26	0.00	1.39	0.13	0.25
TOTAL currently permitted	20.91	18.02	16.68	16.24	1.31	32.45	12.45	14.63	1.09	1.39	0.36	0.29
TOTAL proposed change	-3.26	-3.17	-3.12	-0.60	0.43	-9.24	-2.42	-0.37	-0.36	0.00	-0.08	-0.01

only two boiler TAPs with net proposed increase

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Propionaldehyde	Benzene	Toluene	o-xylene	Phenol	Acrolein	MEK	Dichlorobenzene	Hexane	
0.0126	0.0031	0.0058	0.0074	0.0000	0.0068	0.0228			
							0.00003	0.0432	10169
0.0032	0.2187	0.0479	0.0013	0.0027	0.2083		0.00001	0.0180	11978
-0.0011	-0.0729	-0.0159	0.0004	0.0009	-0.0694		0.00002	0.0252	-1809
emission increase reach IDEQ TAP ELs?							no	no	

									10169
0.01	0.00	0.01	0.01	0.00	0.01	0.02	0.00	0.04	11978
0.02	0.22	0.05	0.01	0.00	0.22	0.02	0.00	0.02	-1808
0.00	-0.07	-0.02	0.00	0.00	-0.07	0.00	0.00	0.03	9

APPENDIX B – AMBIENT AIR QUALITY IMPACT ANALYSES

NO AMBIENT AIR ANALYSIS WAS REQUIRED

APPENDIX C – FACILITY DRAFT COMMENTS

The following comments were received from the facility on November 4, 2014:

Facility Comment: We would like to request the start of the five year interval for the Wellon's source test to coincide with the issue date of the Permit.

DEQ Response: The request for the testing date to be changed from the date stated within the first draft permit deem not to be appropriate because it would not demonstrate compliance with all the previous documentation regarding the testing date for the Wellons boiler. Therefore the date stated in Permit Condition 3.20 of September 27, 2017 for the next performance test will remain.

Facility Comment: We would like to request the section 7.9 requirement to "submit the report be changed from 30 to 60 Days.

DEQ Response: The entire section set in the first draft permit has been eliminated, because it was section not used in the PTC template. The change has been made for the report to be submitted within 60 days of the performance test.

Facility Comment: We would like to request the text in permit section 3.14: All performance testing shall be conducted in accordance with "General Provision 6" be replaced with "permit sections "7.7 – 7.9".

DEQ Response: With the section 6 in the first permit draft being eliminated the General Provision section is presently Section 6. However the permit condition regarding the performance testing in the General Provision section are now permit conditions 6.7-6.9 respectively.

APPENDIX D – PROCESSING FEE

New source or modification to existing source with increase of emissions of less than one(1) ton per year is \$1,000.