



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

Governor Brad Little  
Director John H. Tippets

December 24, 2019

Brian Gustaveson, Rexburg Facility Manager  
Rexburg Facility of Basic American Foods, a Division of Basic American, Inc.  
40 East 7th North  
Rexburg, ID 83440

RE: Facility ID No. 065-00008, Rexburg Facility of Basic American Foods, a Division of Basic American, Inc. Tier I Operating Permit Administrative Amendment

Dear Mr. Gustaveson:

The Department of Environmental Quality (DEQ) is issuing amended Tier I Operating Permit No. T1-2018.0008 to Rexburg Facility of Basic American Foods, a Division of Basic American, Inc. located at 40 East 7th North in accordance with IDAPA 58.01.01.381, Rules for the Control of Air Pollution in Idaho. This permit has been administratively amended by DEQ as requested in your December 2, 2019, submittal and is effective immediately.

Please be aware this permit replaces Tier I Operating Permit No. T1-2018.0008, issued on July 18, 2018, the terms and conditions of which shall no longer apply.

If you have questions regarding the amendment procedure or this notification, please contact Morrie Lewis at 208-373-0502 or [Morrie.Lewis@deq.idaho.gov](mailto:Morrie.Lewis@deq.idaho.gov).

Sincerely,

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

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS/ml

Permit No. T1-2018.0008 Project 62347

Enclosure

# Air Quality

## TIER I OPERATING PERMIT

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**Permittee** Rexburg Facility of Basic American Foods, a Division of Basic American, Inc.

**Permit Number** T1-2018.0008

**Project ID** 62347

**Facility ID** 065-00008

**Facility Location** 40 East 7th North  
Rexburg, ID 83440

### Permit Authority

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

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

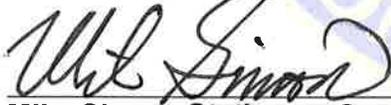
**Date Issued** December 24, 2019

**Date Expires** December 24, 2024



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**Morrie Lewis, Permit Writer**



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**Mike Simon, Stationary Source Manager**

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## Acronyms, Units, and Chemical Nomenclature

ASTM	American Society for Testing and Materials
BAF	Rexburg Facility of Basic American Foods, a Division of Basic American, Inc.
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	continuous emission monitoring systems
CFR	Code of Federal Regulations
CMS	continuous monitoring systems
CO	carbon monoxide
COMS	continuous opacity monitoring systems
DEQ	Idaho Department of Environmental Quality
dscf	dry standard cubic feet
EPA	United States Environmental Protection Agency
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hr	hour
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb	pounds
MMBtu	million British thermal units
MMscf	million standard cubic feet
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 <sub>2</sub>	oxygen
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/day	tons per calendar day
T/yr	tons per consecutive 12 calendar-month period
T1	Tier I operating permit
T2	Tier II operating permit
U.S.C.	United States Code
VOC	volatile organic compounds

# 1 Permit Scope

## Purpose

- 1.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the Rules.
- 1.2 This Tier I operating permit incorporates the following permit:
- Permit to Construct No. P-2011.0132, Project 62264, issued December 6, 2019
- 1.3 This Tier I operating permit replaces the following permit:
- Tier I Operating Permit No. T1-2018.0008, Project 61995, issued July 18, 2018

## Regulated Sources

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

**Table 1.1 Regulated Sources**

Permit Section	Source ID	Source Descriptions	Emission Controls
<b>Boilers</b>			
3	Kipper & Sons Boiler (also called the Kipper Boiler)	Manufacturer: Kipper & Sons Model: N/A S/N: 1300 Heat input rating: 90.0 MMBtu/hr Maximum steam production rate: 65,000 lb/hr Permitted annual steam production rate: 189,800,000 lb/yr Fuel: wood Date installed: 1981	Multiclone and wet Scrubber in series
4	Boiler 1A	Manufacturer: Indeck Keystone Model: KD3.0068 Type D Heat input rating: 98 MMBtu/hr Maximum steam production rate: 80,600 lb/hr Fuel: natural gas only Date of construction: 2018	Low-NO <sub>x</sub> burner
	Boiler 2A	Manufacturer: Indeck Keystone Model: KD3.0068 Type D Heat input rating: 98 MMBtu/hr Maximum steam production rate: 80,600 lb/hr Fuel: natural gas only Date of construction: 2018	Low-NO <sub>x</sub> burner
	Boiler 2	Manufacturer: Murray Model: MCF3-43 S/N: 10509 Heat input rating: 49.9 MMBtu/hr Maximum steam production rate: 40,000 lb/hr Fuel: natural gas only Date installed: 2010	None

Permit Section	Source ID	Source Descriptions	Emission Controls	
<b>Process A</b>				
5	7020	Cooler/Dryer 7020 (Cooler vent)	None	
	7101	Cooler/Dryer 7101 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None	
	7102	Cooler/Dryer 7102 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None	
	7019	Cooler/Dryer 7019 (Dryer, 6.6 MMBtu/hr, steam and natural gas)	None	
	7001	Cooler/Dryer 7001 (Dryer, steam-heated)	None	
	7027	Cooler/Dryer 7027 (Cooler)	None	
	7006	Material Recovery Unit 7006	None	
<b>Process B</b>				
6	5034	Material Recovery Unit 5034	None	
	5037	Cooler/Dryer 5037 (Cooler/dryer vent, dryer is steam heated)	None	
	4000	Cooler/Dryer 4000 (Dryer, steam heated)	None	
	228	Cooler/Dryer 228 (Dryer, natural gas-fired, 16.1 MMBtu/hr)	None	
	234	Cooler/Dryer 234 (Second exhaust from dryer 228)	None	
	707	Material Recovery Unit 707 (fabric filter)	None	
	725	Material Recovery Unit 725 (fabric filter)	None	
	8	Material Recovery Unit 8 (fabric filter)	None	
	5001	Material Recovery Unit 5001	None	
	5000	Material Recovery Unit 5000 (fabric filter)	None	
	432	Material Recovery Unit 432 (fabric filter)	None	
	322	Material Recovery Unit 322	None	
	572	Material Recovery Unit 572 (vent from material recovery cyclone in animal feed load-out system)	None	
	33	Vegetable Dryer M33 (Dryer, natural gas-fired, 2.7 MMBtu/hr)	None	
	44	Vegetable Dryer M44 (Dryer, natural gas-fired, 2.75 MMBtu/hr)	None	
	56	Vegetable Dryer M56 (Dryer, natural gas-fired, 1.6 MMBtu/hr)	None	
	62	Vegetable Dryer M62 (Dryer, natural gas-fired, 1.6 MMBtu/hr)	None	
	86	Vegetable Dryer M86 (Dryer, steam heated)	None	
	Flk-N	Flake Drum #1	Manufacturer: Idaho Steel Products Model: 8FT X 21FT DRUM Installed date: 2018 Dryer, steam-heated, 3,000 lb/hr	<u>MicroMist Scrubber System</u> Manufacturer: EnviroCare International Model No.: MicroMist PM <sub>10</sub> /PM <sub>2.5</sub> removal efficiency: 75%
		Flake Drum #2	Identical with Flake Drum #1	
	Flk-S	Flake Drum #3	Identical with Flake Drum #1	<u>MicroMist Scrubber System</u> Manufacturer: EnviroCare International Model No.: MicroMist PM <sub>10</sub> /PM <sub>2.5</sub> removal efficiency: 75%
		Flake Drum #4	Identical with Flake Drum #1	
	Proctor 4 Dryer		Proctor 4 Dryer, 2000 lb/hr, natural gas fired Stage A: 8.8 MMBtu/hr (Winnox 0200 burner) Stages BCD: 8.8 MMBtu/hr (Winnox 0200 burner) and 2.0 MMBtu/hr (Winnox 0100 burner)	Low-NO <sub>x</sub> burners

Permit Section	Source ID	Source Descriptions	Emission Controls
7	Flake North Air Makeup Unit (AMU) #1	Flake Air Makeup Unit #1, 4.86MMBtu/hr	Low-NO <sub>x</sub> burner
	Flake North AMU #2	Flake Air Makeup Unit #2, 4.86 MMBtu/hr	Low-NO <sub>x</sub> burner
	Flake South AMU#3	Flake Wet Process Air Makeup Unit #3, 2.86 MMBtu/hr	Low-NO <sub>x</sub> burner
	SLAB AMU#4	SLAB Air Makeup Unit #4, 1.29 MMBtu/hr	Low-NO <sub>x</sub> burner
	Potato Cleaning AMU#5	Potato Cleaning Air Makeup Unit #5, 0.72 MMBtu/hr	Low-NO <sub>x</sub> burner
	Boiler Room North AMU#6	Boiler Room Air Makeup Unit #6, 2.5 MMBtu/hr	Low-NO <sub>x</sub> burner
	Boiler Room South AMU#7	Boiler Room Air Makeup Unit #7, 2.5 MMBtu/hr	Low-NO <sub>x</sub> burner
	NA	Plant Space Heaters (27.8 MMBtu/hr)	None
RX-OBI1	Reyco Unit (13.3 MMBtu/hr), installed in 2014	None	

## 2 Facility-Wide Conditions

2.1 Table 2.1 contains a summary of requirements that apply generally to emissions units at the facility.

Table 2.1 Applicable Requirements Summary

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
2.2	CO Emissions	Calculation and notification	P-2011.0132	2.2, 3.28
2.3–2.6	Fugitive Dust	Reasonable control	IDAPA 58.01.01.650–651	2.4–2.6, 2.25, 2.31
2.7–2.8	Odors	Reasonable control	IDAPA 58.01.01.775–776	2.8, 2.25, 2.31
2.9–2.11	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	2.10–2.11, 2.25, 2.31
2.12–2.16	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130–136	2.12–2.16, 2.25, 2.31
2.17–2.18	Sulfur Content	ASTM grade No. 1 fuel oil ≤ 0.3% by weight ASTM grade No. 2 fuel oil ≤ 0.5% by weight	IDAPA 58.01.01.725	2.18, 2.25, 2.31
2.19	Open Burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600–623	2.19, 2.25, 2.31
2.20	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.20, 2.25, 2.31
2.21	Accidental Release Prevention	Compliance with 40 CFR 68	40 CFR 68	2.21, 2.25, 2.31
2.22	Recycling and Emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	2.22, 2.25, 2.31
2.23, 2.24	NSPS/NESHAP General Provisions	Compliance with 40 CFR 60/63, Subpart A	IDAPA 58.01.01.107.03	2.23, 2.24, 2.25, 2.31
2.25	Monitoring and Recordkeeping	Maintenance of required records	IDAPA 58.01.01.322.06	2.25, 2.31
2.26–2.30	Testing	Compliance testing	IDAPA 58.01.01.157	2.26–2.30, 2.25, 2.31
2.31	Reports and Certifications	Submittal of required reports, notifications, and certifications	IDAPA 58.01.01.322.08	2.31
2.32	Incorporation of Federal Requirements by Reference	Compliance with applicable federal requirements referenced	IDAPA 58.01.01.107	2.32

## **Carbon Monoxide (CO) Emissions Limit**

### **2.2 Facility-Wide CO PTE Calculation and Notification**

Whenever a new source is installed that emits CO, the permittee shall calculate facility-wide CO PTE and submit the revised facility-wide CO PTE to DEQ no later than 60 days of the installation, or within DEQ approved alternative timeframe.

The submittal shall be titled "Facility-wide CO PTE Change Notification for Rexburg Facility of Basic American Foods, a Division of Basic American, Inc. 065-00008"

[PTC No. P-2011.0132, 12/06/19]

## **Fugitive Dust**

2.3 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651.

[IDAPA 58.01.01.650–651, 4/11/15]

2.4 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive emissions.

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

2.5 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

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

2.6 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

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

## **Odors**

2.7 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]

2.8 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

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

## Visible Emissions

- 2.9 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.  
[IDAPA 58.01.01.625, 5/8/09]
- 2.10 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:
- a) Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).
- or
- b) Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.  
[IDAPA 58.01.01.322.06, 5/1/94]
- 2.11 The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.  
[IDAPA 58.01.01.322.07, 5/1/94]

## Excess Emissions

### *Excess Emissions-General*

- 2.12 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.

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

[IDAPA 58.01.01.132, 4/5/00]

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

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

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

[IDAPA 58.01.01.133, 4/11/06]

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

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

- Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
- Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
- Report and record the information required pursuant to the excess emissions reporting and recordkeeping facility-wide conditions and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
- During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

[IDAPA 58.01.01.134, 4/11/06]

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

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

[IDAPA 58.01.01.135, 4/11/06]

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

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

[IDAPA 58.01.01.136, 4/5/00]

### **Sulfur Content**

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

- Distillate fuel oil containing more than the following percentages of sulfur:
  - ASTM Grade 1 fuel oil, 0.3% by weight
  - ASTM Grade 2 fuel oil, 0.5% by weight
- Coal containing greater than 1.0% sulfur by weight
- DEQ may approve an exemption from these fuel sulfur content requirements (IDAPA 58.01.01.725.01 725.04) if the permittee demonstrates that, through control measures or other means, SO<sub>2</sub> emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 4/11/15]

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

[IDAPA 58.01.01.322.07, 5/1/94]

### **Open Burning**

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

[IDAPA 58.01.01.600–623, 3/17/17]

### **Asbestos**

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

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

[40 CFR 61, Subpart M]

## Accidental Release Prevention

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

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

[40 CFR 68.10(a)]

## Recycling and Emissions Reductions

**2.22** 40 CFR Part 82—Protection of Stratospheric Ozone

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

[40 CFR 82, Subpart F]

## NSPS/NESHAP General Provisions

**2.23** NSPS 40 CFR 60, Subpart A-General Provisions

The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A “General Provisions” in accordance with 40 CFR 60.1. A summary of requirements for affected facilities is provided in Table 2.2.

Table 2.2 NSPS 40 CFR 60, Subpart A - Summary of General Provisions

Section	Subject	Summary of Section Requirements
60.4	Address	<ul style="list-style-type: none"> <li>• All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart(s) shall be submitted to: Idaho Falls Regional Office 900 N. Skyline, Ste. B Idaho Falls, ID 83402</li> </ul>
60.7(a), (b), and (f)	Notification and Recordkeeping	<ul style="list-style-type: none"> <li>• Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date.</li> <li>• Notification shall be furnished of initial startup postmarked within 15 days of such date.</li> <li>• Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made.</li> <li>• Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative.</li> <li>• Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.</li> </ul>

60.8	Performance Tests	<ul style="list-style-type: none"> <li>At least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present.</li> <li>Within 60 days of achieving the maximum production rate, but not later 180 days after initial startup, performance test(s) shall be conducted and a written report of the results of such test(s) furnished.</li> <li>Performance testing facilities shall be provided as follows: <ul style="list-style-type: none"> <li>Sampling ports adequate for test methods applicable to such facility.</li> <li>Safe sampling platform(s).</li> <li>Safe access to sampling platform(s).</li> <li>Utilities for sampling and testing equipment.</li> </ul> </li> <li>Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f)</li> </ul>
60.11(a), (d), (f), and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> <li>When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8.</li> <li>At all times, including periods of startup, shutdown, and malfunction, the owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.</li> <li>For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.</li> </ul>
60.11(b), (c), and (e)	Compliance with Standards and Maintenance Requirements (Opacity)	<ul style="list-style-type: none"> <li>Compliance with opacity standards shall be determined by Method 9 in Appendix A of 40 CFR 60. The permittee may elect to use COM measurements in lieu of Method 9, provided notification is made at least 30 days before the performance test.</li> <li>The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided.</li> <li>Opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 in accordance with the requirements and exceptions in 40 CFR 60.11(e).</li> </ul>
60.12	Circumvention	<ul style="list-style-type: none"> <li>No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.</li> </ul>
60.13	Monitoring Requirements (CMS)	<ul style="list-style-type: none"> <li>All CMS and monitoring devices shall be installed and operational prior to conducting performance tests required by 40 CFR 60.8.</li> <li>A performance evaluation of the COMS or CEMS shall be conducted before or during any performance test and a written report of the results of the performance evaluation furnished. Reporting requirements include submitting performance evaluations reports within 60 days of the evaluations required by this section, and submitting results of the performance evaluations for the COM within 10 days before a performance test, if using a COM to determine compliance with opacity during a performance test instead of Method 9.</li> <li>The zero and span calibration drifts must be checked at least once daily and adjusted in accordance with the requirements in 40 CFR 60.13(d).</li> <li>The zero and upscale (span) calibration drifts of a COMS must be automatically, intrinsic to the opacity monitor, checked at least once daily.</li> <li>Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CMS shall be in continuous operation and shall meet minimum frequency of operation requirements as specified in 40 CFR 60.13(e).</li> <li>All CMS or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. CMS shall be located and installed in accordance with the requirements in 40 CFR 60.13(f) and (g).</li> <li>Data shall be reduced and computed in accordance with the procedures in 40 CFR 60.13(h), (i), and (j).</li> </ul>
60.14	Modification	<ul style="list-style-type: none"> <li>A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14.</li> <li>Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.</li> </ul>
60.15	Reconstruction	<ul style="list-style-type: none"> <li>An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.</li> </ul>

[40 CFR 60, Subpart A]

## 2.24 NESHAP 40 CFR 63, Subpart A – General Provision

The permittee shall comply with the requirements of 40 CFR 63, Subpart A “General Provisions.” A summary of applicable requirements for affected sources is provided in Table 2.3.

**Table 2.3 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources**

Section	Subject	Summary of Section Requirements
63.13	Address	<ul style="list-style-type: none"> <li>All requests, reports, applications, submittals, and other communications associated with 40 CFR 63, Subpart(s) shall be submitted to: <ul style="list-style-type: none"> <li>Clean Air Compliance Manager</li> <li>US EPA Region 10, Mail Stop: OCE-101</li> <li>1200 Sixth Avenue, Suite 155</li> <li>Seattle, WA 98101</li> <li>Idaho Falls Regional Office</li> <li>900 N. Skyline, Ste. B</li> <li>Idaho Falls, ID 83402</li> </ul> </li> </ul>
63.4(a)	Prohibited Activities	<ul style="list-style-type: none"> <li>No permittee must operate any affected source in violation of the requirements of 40 CFR 63 in accordance with 40 CFR 63.4(a). No permittee subject to the provisions of this part shall fail to keep records, notify, report, or revise reports as required under this part.</li> </ul>
63.4(b)	Circumvention/ Fragmentation	<ul style="list-style-type: none"> <li>No permittee shall build, erect, install or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard.</li> <li>Fragmentation which divides ownership of an operation, within the same facility among various owners where there is no real change in control, will not affect applicability in accordance with 40 CFR 63.4(c).</li> </ul>
63.6(b) and (c)	Compliance Dates	<ul style="list-style-type: none"> <li>The permittee of any new or reconstructed source must comply with the relevant standard as specified in 40 CFR 63.6(b). <ul style="list-style-type: none"> <li>The permittee of a source that has an initial startup before the effective date of a relevant standard must comply not later than the standard's effective date in accordance with 40 CFR 63.6(b)(1).</li> <li>The permittee of a source that has an initial startup after the effective date of a relevant standard must comply upon startup of the source in accordance with 40 CFR 63.6(b)(2).</li> </ul> </li> <li>The permittee of any existing sources must comply with the relevant standard by the compliance date established in the applicable subpart or as specified in 40 CFR 63.6(c). <ul style="list-style-type: none"> <li>The permittee of an area source that increases its emissions of hazardous air pollutants such that the source becomes a major source shall be subject to relevant standards for existing sources in accordance with 40 CFR 63.6(c)(5).</li> </ul> </li> </ul>
63.6(e) and (f)	Compliance with Standards and Maintenance Requirements (Non-Opacity)	<ul style="list-style-type: none"> <li>At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions in accordance with 40 CFR 63.6(e).</li> <li>The permittee of an affected source must develop a written startup, shutdown, and malfunction plan and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard in accordance with 40 CFR 63.6(e). The permittee must maintain the current plan at the affected source and must make the plan available upon request. If the plan fails to address or inadequately addresses a malfunction, the permittee must revise the plan within 45 days after the event.</li> <li>The permittee must record and report actions taken during a startup, shutdown, or malfunction in accordance with the requirements in 40 CFR 63.6(e). The permittee shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the plan in the semiannual startup, shutdown, and malfunction report.</li> <li>Non-opacity emission standards shall apply at all times except during periods of startup, shutdown, and malfunction, and as otherwise specified, in accordance with 40 CFR 63.6(f).</li> </ul>

**Table 2.3 (continued)**

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

Table 2.3 (continued)

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

Table 2.3 (continued)

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

[40 CFR 63, Subpart A]

## Monitoring and Recordkeeping

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

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

## Performance Testing

- 2.26** 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.
- 2.27** All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:
- The type of method to be used.
  - Any extenuating or unusual circumstances regarding the proposed test.
  - The proposed schedule for conducting and reporting the test.
- [IDAPA 58.01.01.157, 4/11/15; IDAPA 58.01.01.322.06, 08, 09, 4/11/15]
- 2.28** Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.
- [IDAPA 58.01.01.157, 4/11/15; IDAPA 58.01.01.322.08, 09, 4/5/00]
- 2.29** The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the "Reports and Certifications" facility-wide condition.

[IDAPA 58.01.01.157, 4/11/15; IDAPA 58.01.01.322.06, 08, 09, 4/5/00]

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

**Table 2.4 Test Methods**

Pollutant	Test Method	Additional Requirements
PM <sub>2.5</sub> and PM <sub>10</sub>	EPA Methods 5 / 202, or 201A / 202	Particulate matter with an aerodynamic diameter less than or equal to a 2.5 and 10 micrometers (respectively), including condensable particulate as defined in IDAPA 58.01.01.006.
NO <sub>x</sub>	EPA Method 7E	---
CO	EPA Method 10	---

[PTC No. P-2011.0132, 12/06/19]

## Reports and Certifications

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

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

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

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

[IDAPA 58.01.01.322.08, 11, 4/5/00]

## Incorporation of Federal Requirements by Reference

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

- Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63, Subpart JJJJJ – Industrial, Commercial, and Institutional Boilers
- Applicable requirements of Compliance Assurance Monitoring (CAM), 40 CFR 64
- Applicable requirements of Protection of Stratospheric Ozone, 40 CFR Part 82

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

[IDAPA 58.01.01.107, 3/29/17; PTC No. P-2011.0132, 12/06/19]

### 3 Kipper Boiler

#### Summary Description

The Kipper boiler is a wood and coal-fired boiler with an original steam production rating of 60,000 pounds per hour. The boiler can burn up to 39% coal on a fuel weight basis (i.e. 50% of the heating value). The Kipper boiler was installed in 1981, and an economizer was added in 2001, increasing the maximum steam production rate to 65,000 lb/hr due to increased boiler efficiency. Emission controls on the Kipper boiler include a Zurn multiclone dust collector and a Riley Ventri-Rod® scrubber in series.

The permittee has requested to eliminate the option of burning coal, and therefore the use of coal as a fuel to Kipper boiler shall be made inoperative. In addition, the permittee has also requested that the Kipper boiler is used as a backup or standby boiler with an annual steam production limit of 189,800,000 pound per year and that the Kipper boiler will not operate concurrently with Boiler 2.

#### 3.1 Control Device Descriptions

Table 3.1 Emissions Unit and Emissions Control Device

Emissions Units / Processes	Control Devices
Kipper Boiler	Zurn multiclone and Riley Ventri-Rod® scrubber in series

3.2 Table 3.2 contains only a summary of the requirements that apply to the Kipper Boiler. Specific permit requirements are listed below.

Table 3.2 Applicable Requirements Summary

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
3.3	PM <sub>2.5</sub> /PM <sub>10</sub>	Limits as specified in Table 3.2	P-2011.0132	3.6–3.11, 3.14–3.16, 3.17–3.26, 3.29, 3.31
3.3	NO <sub>x</sub>	Limits as specified in Table 3.2	P-2011.0132	3.6–3.8, 3.10, 3.14–3.16, 3.28, 3.31
3.5	Fuel burning equipment PM emissions limit	0.080 gr/dscf corrected to 8% O <sub>2</sub> when burning wood	P-2011.0132 IDAPA 58.01.01.675	3.6–3.11, 3.14–3.16, 3.17–3.26, 3.29, 3.31
3.6	Boiler fuel types	Wood only	P-2011.0132	3.7
3.8, 3.10	Steam production and Operation	65,000 lb/hr (24-hr avg) and 189,800,000 lb/yr No concurrent operation with Boiler 2	P-2011.0132	3.15–3.16
3.9	Control equipment requirements	Inspect, maintain, and operate boiler, scrubber, and multiclone to control PM, PM <sub>10</sub> , and SO <sub>2</sub> .	P-2011.0132	3.11
3.12–3.13	Tune-up	Tune-up requirements	P-2011.0132 NESHAP Subpart JJJJJ	3.27, 3.32
3.14	Wood fuel requirement	Specifications for type of wood combusted	P-2011.0132 NESHAP Subpart JJJJJ	3.32

## Emission Limits

### 3.3 Emissions Limits

The emissions from the Kipper boiler stack shall not exceed any corresponding emissions rate limits listed in Table 3.3.

**Table 3.3 Kipper Boiler Emission Limits <sup>(a)</sup>**

PM <sub>2.5</sub> /PM <sub>10</sub> <sup>(b)</sup>		NO <sub>x</sub>	
lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
13.6	19.8	21.6	31.5

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006. Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d) Tons per any consecutive 12-calendar month period.

[PTC No. P-2011.0132, 12/06/19]

### 3.4 Reserved

[PTC No. P-2011.0132, 12/06/19]

### 3.5 Fuel Burning Equipment - PM

Particulate matter emissions from the Kipper boiler shall not exceed 0.080 gr/dscf corrected to 8% oxygen when burning wood fuel.

[IDAPA 58.01.01.675, 4/5/00; PTC No. P-2011.0132, 12/06/19]

## Operating Requirements

### 3.6 Kipper Boiler Fuel Type

The permittee shall exclusively combust wood in the Kipper boiler.

[PTC No. P-2011.0132, 12/06/19]

### 3.7 Decommission Coal as Fuel

Equipment to use coal as a fuel to Kipper boiler shall be inoperative no later than 60 days after the permit issuance. The permittee shall notice DEQ Idaho Falls Regional office after this is achieved.

[IDAPA 58.01.01.725, 4/11/15; PTC No. P-2011.0132, 12/06/19]

### 3.8 Steam Production

- The Kipper boiler steam production rate shall not exceed 65,000 pounds of steam per hour on a 24-hour rolling average.
- The Kipper boiler steam production rate shall not exceed 189,800,000 pounds of steam per any consecutive 12-month period.

[40 CFR 64.6; PTC No. P-2011.0132, 12/06/19]

### 3.9 Ventri-Rod<sup>®</sup> Scrubber and Multiclone

The permittee shall install, maintain, and operate a multiclone and a wet scrubber on the Kipper boiler to control the emissions of PM, PM<sub>10</sub>, and PM<sub>2.5</sub>.

[PTC No. P-2011.0132, 12/06/19]

### **3.10 Operation Requirement**

The Kipper boiler shall not operate concurrently with Boiler 2.

[PTC No. P-2011.0132, 12/06/19]

### **3.11 Boiler, Ventri-Rod® Scrubber, and Multiclone Annual Inspection and Maintenance**

At least once per calendar year, the permittee shall inspect the internal workings of the Kipper boiler and perform any maintenance required to maintain efficient combustion. The permittee shall also inspect the Ventri-Rod® scrubber and multiclone and perform any maintenance required. The permittee shall maintain records of the boiler, Ventri-Rod® scrubber, and multiclone maintenance conducted to comply with this permit condition. The records shall provide the date the inspection was conducted and a description of the maintenance performed on the boiler to maintain combustion efficiency.

[PTC No. P-2011.0132, 12/06/19]

### **3.12 NESHAP 40 CFR 63 Subpart JJJJJ – Tune-Up Procedures**

In accordance with 40 CFR 63.11223(b), the facility must conduct a performance tune-up of the Kipper boiler according to this permit condition and keep records as required in the records maintenance permit condition in this section. The facility 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); PTC No. P-2011.0132, 12/06/19]

### **3.13 NESHAP 40 CFR 63 Subpart JJJJJ – Tune-Up Requirements**

The permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in this permit condition. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up unless an oxygen trim system is utilized (40 CFR 63.11223(c), (d), (e), and (f)), in which case the tune-up must be conducted every 61 months.

- As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the facility may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- 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 (the facility may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- Maintain on-site and submit, if requested by the Administrator, a report containing the information as follows:

- 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.
  - A description of any corrective actions taken as a part of the tune-up of the boiler.
  - 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.
- 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); PTC No. P-2011.0132, 12/06/19]

### **3.14 Fuel Requirement**

Wood materials combusted in the Kipper Boiler shall be either “clean cellulosic biomass” (as defined in 40 CFR 241.2) or fuels produced from the processing of discarded non-hazardous secondary materials and that meet the legitimacy criteria specified in 40 CFR 241.3(d)(1). If wood materials that do not meet these requirements are combusted in the Kipper boiler, the permittee shall comply with applicable provisions for units combusting non-hazardous solid waste enacted in accordance with 40 CFR 60, Subpart DDDDD.

[PTC No. P-2011.0132, 12/06/19]

## **Monitoring and Recordkeeping Requirements**

### **3.15 Steam Monitoring**

- The steam produced in the boiler shall be monitored and recorded at least once per hour in units of pounds of steam per hour and average pounds of steam per hour per rolling 24-hour period.
- Every month, the permittee shall record the steam produced in the month and record the steam produced in the previous consecutive 12-month period.

[PTC No. P-2011.0132, 12/06/19]

### **3.16 Operation Requirement Monitoring**

The permittee shall keep records, such as Kipper boiler and Boiler 2 steaming production records containing date and time to demonstrate that the Kipper boiler does not operate concurrently with Boiler 2.

[PTC No. P-2011.0132, 12/06/19]

### **3.17 CAM 40 CFR 64.6 – Approved Monitoring**

The permittee shall assure compliance with the particulate matter permit limits and standards for the Kipper boiler by conducting the approved monitoring and recordkeeping listed in the following table.

Table 3.4 CAM for the Kipper Boiler

Indicator	Indicator No. 1	Indicator No. 2	Indicator No. 3	Indicator No. 4	Indicator No. 5
	Boiler Steaming Rate	Multiclone Pressure Drop	Scrubber Downstream static pressure	Scrubber Water Pressure	Combination of firebox static pressure and induced draft fan speed setting
Measurement Approach	The boiler steaming rate is measured using a pressure and temperature compensated orifice plate that is located in the steam header. Data acquisition system monitors pressure drop across the plate, steam temperature, and steam pressure and calculates steam rate from these parameters.	The multiclone pressure drop is measured by digital pressure gauges located upstream and downstream of the multiclones. Pressure drop is determined by the difference in reading between the gauges and is displayed in the boiler control room.	The scrubber downstream static pressure is measured using a digital pressure gauge in the scrubber throat downstream of the scrubber rods.	The scrubber water pressure is measured using a manual pressure gauge located in the scrubber water supply header. Scrubber water pressure is determined by direct observation of the gauge.	The firebox static pressure is measured using a digital pressure gauge tapped into the firebox. The induced draft fan speed setting is measured directly from the speed control setting for the fan.
Indicator Range	An excursion <sup>(a)</sup> is defined as a boiler steaming rate less than 35,000 lb/hr or greater than 65,000 lb/hr on a 24-hour rolling average.	An excursion <sup>(a)</sup> is defined as a multiclone pressure drop less than 1.0 inches of water or greater than 6.0 inches of water.	An excursion <sup>(a)</sup> is defined as a scrubber downstream static pressure that is less than 5.6 inches of water column.	An excursion <sup>(a)</sup> is defined as a scrubber water pressure less than 4.0 psig or greater than 10 psig.	An excursion <sup>(a)</sup> is defined as any time the induced draft fan goes to 100% speed and is unable to maintain a negative pressure in the firebox.
Data Representativeness	The boiler steaming rate sensor is located in the steam header.	The multiclone pressure drop monitors are located upstream and downstream of the multiclones. The sensitivity is $\pm 0.1$ in. H <sub>2</sub> O.	The scrubber downstream static pressure monitor is located downstream of the scrubber rods. The sensitivity is $\pm 0.1$ in. H <sub>2</sub> O.	The scrubber water pressure monitor is located in the water supply header. The gauge can be read to $\pm 0.5$ psig.	The firebox static pressure monitor is tapped into the firebox. The sensitivity is 0.01 inches of water column. The fan speed is recorded directly from the boiler control system and is recorded to the nearest 0.1 %.
QA/QC Practices	The steam recorder was calibrated when installed. The orifice plate will be inspected every other year for physical condition and the permittee will check the overall health of the transmitter system by conducting span checks.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. <sup>(c)</sup> The performance of the transmitters will be checked every other year and will include conducting span checks of the entire loop.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. <sup>(b)</sup> The performance of the transmitter will be checked every other year and will include conducting span checks of the entire loop.	The pressure gauge reading will be compared with a second manual pressure gauge monthly. If readings differ by more than 1 psig, troubleshooting will be initiated.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. The performance of the transmitters will be checked every other year and will include conducting span checks of the entire loop. The induced draft fan speed setting does not require a calibration.
Monitoring Frequency	The boiler steam production is totalized continuously and recorded hourly.	Recorded every 2 hours.	Recorded every 2 hours.	Recorded every 2 hours.	Recorded every 2 hours.
Data Collection Procedures	Data acquisition system records hourly total.	Manually recorded in the boiler operating log.	Manually recorded in the boiler operating log.	Manually recorded in the boiler operating log.	Manually recorded in the boiler log.
Averaging Period <sup>(c)</sup>	1-hour average steaming rate	Not to be exceeded at any time	Not to be exceeded at any time	Not to be exceeded at any time	Not to be exceeded at any time

- a) Excursion is defined in 40 CFR 64 as a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.
- b) The statement regarding stability of digital pressure monitors was provided by the permittee in December 7, 2007, Compliance Assurance Monitoring Design letter.
- c) The operating parameters are not to be deviated from at any time under normal operation. Periods of startup and shutdown are excluded.

[40 CFR 64.6; PTC No. P-2011.0132, 12/06/19]

### **3.18 CAM 40 CFR 64 – Commencement of Operation**

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

[40 CFR 64.7(a); PTC No. P-2011.0132, 12/06/19]

### **3.19 CAM 40 CFR 64 – Proper Maintenance**

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

[40 CFR 64.7(b); PTC No. P-2011.0132, 12/06/19]

### **3.20 CAM 40 CFR 64 – Continued Operation**

In accordance with 40 CFR 64.7(c), except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the Kipper Boiler is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of CAM, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c); PTC No. P-2011.0132, 12/06/19]

### **3.21 CAM 40 CFR 64 – Response to Excursions or Exceedances**

- In accordance with 40 CFR 64.7(d), upon detecting an excursion or exceedance, the permittee shall restore operation of the emissions unit(s) (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 CFR 64.7(d); PTC No. P-2011.0132, 12/06/19]

### **3.22 CAM 40 CFR 64 – Performance Criteria**

In accordance with 40 CFR 64.3(b), for the description of the control device(s) (e.g., multiclone in series with a wet scrubber and cyclone separator), if the manufacturer specifications for the monitoring devices for indicator 1 (e.g., pressure drop) and indicator 2 (e.g., scrubbing media flow rate) include calibration procedures but do not specify a calibration frequency, the device shall be calibrated at least once each calendar year.

[40 CFR 64.3(b)(1), (2), and (3)]

### **3.23 CAM 40 CFR 64 – Excursion**

In accordance with 40 CFR 64.6(c)(2), excursions shall be defined as any indicator measurement which exceeds the corresponding indicator range specified as CAM for the Kipper Boiler (Table 3.4).

[40 CFR 64.6(c)(2)]

### **3.24 CAM 40 CFR 64 – Documentation of Need for Improved Monitoring**

In accordance with 40 CFR 64.7(e), if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the T1 operating permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7(e); PTC No. P-2011.0132, 12/06/19]

### **3.25 CAM 40 CFR 64 – Quality Improvement Plan (QIP)**

In accordance with 40 CFR 64.8(a), the permittee shall develop and implement a quality improvement plan (QIP) if an accumulation of exceedances or excursions exceeds 5 percent duration of the corresponding boiler's operating time for a reporting period.

[40 CFR 64.8(a); PTC No. P-2011.0132, 12/06/19]

### **3.26 CAM 40 CFR 64 – CAM General Recordkeeping**

In accordance with 40 CFR 64.9(b), the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring or records of monitoring maintenance or corrective actions).

- Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR 64.9(b); PTC No. P-2011.0132, 12/06/19]

### 3.27 NESHAP 40 CFR 63 Subpart JJJJJ – Records Maintenance

In accordance with 40 CFR 63.11225(c), for the Kipper boiler, the permittee must maintain the records specified in this permit condition.

- As required in 40 CFR 63.10(b)(2)(xiv), the permittee must keep a copy of each notification and report that the permittee submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted.
- The permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR 63.11214 and 40 CFR 63.11223 as specified in paragraphs (2)(i) through (iii) of this section.
  - Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
  - For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR 241.3(b)(1) of this chapter, the permittee must keep a record which documents how the secondary material meets each of the legitimacy criteria under 40 CFR 241.3(d)(1). If the permittee combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(4) of this chapter, the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR 241.2 and each of the legitimacy criteria in 40 CFR 241.3(d)(1) of this chapter. If the fuel received a non-waste determination pursuant to the petition process submitted under 40 CFR 241.3(c) of this chapter, the permittee must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per 40 CFR 241.4, the permittee must keep records documenting that the material is a listed non-waste under 40 CFR 241.4(a).
  - For each boiler required to conduct an energy assessment, the permittee must keep a copy of the 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 40 CFR 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.

In accordance with 40 CFR 63.11225(d), the permittee's records must be in a form suitable and readily available for expeditious review. The permittee must keep each record for 5 years following the date of each recorded action. The permittee 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. The permittee may keep the records off site for the remaining 3 years.

[40 CFR 63.11225(c),(d)]

## Performance Testing Requirements

### 3.28 NO<sub>x</sub> and CO Performance Test

Within five years of the permit issuance and at such other times as may be required by the Director, the permittee shall conduct a performance test to measure NO<sub>x</sub> and CO emissions from the Kipper boiler stack to demonstrate compliance with the NO<sub>x</sub> limits in Emissions Limits permit condition and to verify CO emissions factor (EF) that is equal to or less than 0.669 lb/MMBtu, or 0.927 lb CO/1,000 lbs steam, whichever is more stringent. The test shall be conducted in accordance with the procedures outlined in Performance Test permit condition (i.e., Permit Condition 2.2). The performance test and any subsequent performance tests conducted to demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The boiler steaming rate;
- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- The measured NO<sub>x</sub> and CO emission rates shall be reported in units of pounds per hour. All calculations used to convert the test results into these units shall be provided in the test report; and
- The quantity of wood shall be reported by weight (in units of tons/hr) or by gross heat content (in units of MMBtu/hr and Btu/lb). The methods used to obtain these values and to make these determinations shall be described.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-2011.0132, 12/06/19]

### 3.29 PM and PM<sub>10</sub> Performance Tests

Within 10 years of the permit issuance and at such other times as may be required by the Director, the permittee shall conduct a performance test to measure PM and PM<sub>10</sub> emissions from the Kipper boiler stack to demonstrate compliance with the PM emissions standard in the Fuel Burning Equipment – PM permit condition and the PM<sub>10</sub>/PM<sub>2.5</sub> emissions limits in Emissions Limits permit condition.

The tests shall be conducted in accordance with the procedures outlined in Performance Test permit condition (i.e., Permit Condition 2.2). The performance tests conducted to demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The boiler steaming rate;
- The static air pressure and water pressure at the wet Ventri-Rod<sup>®</sup> scrubber;
- The pressure drop across the multiclone;
- The quantity of wood shall be reported, either by weight (in units of tons/hr) or by gross heat content (in units of MMBtu/hr and Btu/lb). The methods used to obtain these values shall be described.

The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report. Visible emissions shall be observed and recorded using the methods specified in IDAPA 58.01.01.625. In addition to correcting the Method 5 test results to 8% oxygen, the

Method 5 results shall be corrected for altitude as required by IDAPA 58.01.01.680 to demonstrate compliance with the fuel burning equipment particulate matter standard.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-2011.0132, 12/06/19]

## Reporting Requirements

### 3.30 Reserved

[PTC No. P-2011.0132, 12/06/19]

### 3.31 CAM 40 CFR 64 – CAM General Reporting

- On and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part (i.e., 40 CFR 64) the owner or operator shall submit monitoring reports to the permitting authority in accordance with 40 CFR 70.6(a)(3)(iii) (see General Provision 9.26).
- In accordance with 40 CFR 64.9(a)(2), the reports required by the Semiannual Monitoring Reports and Reporting Deviations and Excess Emissions General Provisions shall include the following information for those emissions units listed in Table 3.4.
- Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken.
- Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).

[40 CFR 64.9(a)]

### 3.32 NESHAP 40 CFR 63 Subpart JJJJJJ – Biennial Compliance Report

In accordance with 40 CFR 63.11225(b), the permittee must prepare a biennial or 5-year compliance report as specified in paragraphs (1) and (2) of this permit condition.

- Company name and address.
- 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. The permittee notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
  - “This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler.”
  - For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.”
  - “This facility complies with the requirement in 40 CFR 40 CFR 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available.”

[40 CFR 63.11225(b)]

## 4 Boiler 2, Boiler 1A, and Boiler 2A

### Summary Description

Steam is produced in the boilers to run drying processes in Process A and Process B. Boiler 1A and Boiler 2A are the primary boilers, with Boiler 2 and Kipper Boiler providing backup or standby capacity. Boiler 2 will not operate concurrently with the Kipper boiler.

- 4.1 Table 4.1 describes the devices used to control emissions from Boiler 1A, Boiler 2A, and Boiler 2.

**Table 4.1 Boiler 2, Boiler 1A, and Boiler 2A Descriptions**

Emissions Units / Processes	Control Devices
Boiler 1A	Low-NO <sub>x</sub> burner
Boiler 2A	Low-NO <sub>x</sub> burner
Boiler 2	None

- 4.2 Table 4.2 contains only a summary of the requirements that apply to Boiler 1 and Boiler 2. Specific permit requirements are listed below.

**Table 4.2 Applicable Requirements Summary**

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
4.3	PM <sub>2.5</sub> /PM <sub>10</sub>	Limits as specified in Table 4.3	P-2011.0132	4.5–4.6
4.3	NO <sub>x</sub>	Limits as specified in Table 4.3	P-2011.0132	4.5–4.6, 4.7–4.8
4.4	Particulate matter	0.015 gr/dscf corrected to 3% O <sub>2</sub>	P-2011.0132 IDAPA 58.01.01.675	4.5–4.6
4.9–4.10	Fuel monitoring	Specifications for natural gas combustion	P-2011.0132 40 CFR 60 Subpart Dc	4.9–4.10

## Emission Limits

### 4.3 Emission Limits

Emissions from each boiler stack shall not exceed any corresponding emission rate limit in the following table.

Table 4.3 Emission Limits <sup>(a)</sup>

Source Description		PM <sub>2.5</sub> <sup>(b)</sup>	PM <sub>10</sub> <sup>(c)</sup>	NO <sub>x</sub>
		lb/hr <sup>(d)</sup>	lb/hr <sup>(d)</sup>	lb/hr <sup>(d)</sup>
Boiler 1A Stack	Boiler 1A	0.73	0.73	1.79
	Emissions from AMUs allocated to Boiler 1A stack	0.001	0.001	0.103
Boiler 2A Stack	Boiler 2A	0.73	0.73	1.79
	Emissions from AMUs allocated to Boiler 2A stack	0.001	0.001	0.103
Boiler 2 Stack	Boiler 2	0.37	0.37	4.89

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c) Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- d) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.

[IDAPA 58.01.01.675, 5/1/94; PTC No. P-2011.0132, 12/06/19]

### 4.4 Fuel Burning Equipment - PM

Particulate matter emissions from each boiler stack (Boiler 2, Boiler 1A, and Boiler 2A) shall not exceed 0.015 gr/dscf corrected to 3% oxygen when burning natural gas, in accordance with IDAPA 58.01.01.676-677.

[IDAPA 58.01.01.675, 5/1/94; PTC No. P-2011.0132, 12/06/19]

### 4.5 Boiler Annual Inspection and Maintenance

At least once per calendar year or per a DEQ-approved schedule, the permittee shall tune and adjust the burner systems of Boiler 2, Boiler 1A, and Boiler 2A to maintain efficient combustion. The permittee shall maintain records of the boiler tuning conducted to comply with this permit condition. The records shall provide the date the tuning was conducted and a description of the adjustments made to the boiler to maintain combustion efficiency.

[PTC No. P-2011.0132, 12/06/19]

### 4.6 Natural Gas Combustion Monitoring

The permittee shall install, calibrate, maintain, and operate equipment to measure the quantity of natural gas combusted in Boiler 2, Boiler 1A, and Boiler 2A. The natural gas combustion data is used in the facility-wide CO emission calculation in the monitoring and recordkeeping requirements of the CO Facility-Wide Emissions Limit (Permit Condition 2.1). The following quantities of natural gas combusted shall be monitored and recorded each calendar month in units of million standard cubic feet (MMscf) per month and MMscf per rolling 12-calendar month period:

- Total gas combusted at the Rexburg facility
- Total gas combusted by Boilers 1A and 2A ( $G_{B1A2A}$ )
- Gas combusted by Boiler 2 ( $G_{B2}$ )
- Each rolling 12-calendar month calculation shall be the summation of the quantities of gas combusted in that calendar month and in each of the preceding 11 calendar months.

## Performance Testing Requirements

### 4.7 Initial Performance Test

Within 180 days after initial startup, the permittee shall conduct performance tests to measure NO<sub>x</sub> emissions from either Boiler 1A or Boiler 2A to demonstrate compliance with the corresponding boiler pound per hour emission rate limit (Permit Condition 4.3). Tests shall be conducted in accordance with the procedures outlined in the performance testing requirements (Permit Conditions 2.2 and 4.8 and General Provisions 9.7 through 9.9) or as otherwise approved by DEQ. The performance test monitoring parameters (Permit Condition 4.8) shall be recorded during each performance test run and included in the performance test report. The boiler shall be operated at the worst-case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report.

[PTC No. P-2011.0132, 12/06/19]

### 4.8 Performance Test Monitoring

The permittee shall monitor and record the following parameters during each performance test:

- The steaming rate in pounds of steam per hour (lb/hr) every 15 minutes.

[PTC No. P-2011.0132, 12/06/19]

## Monitoring, Recordkeeping, and Reporting Requirements

### 4.9 NSPS 40 CFR 60, Subpart Dc – Applicability Notification, Monitoring, and Reporting Requirements

In accordance with 40 CFR 60.48c(a), the permittee shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup as required by 40 CFR 60.7 for Boiler 1A and Boiler 2A. The notification shall include the following:

- The design heat input capacity of each boiler,
- The fuel(s) to be combusted in each boiler, and
- The annual capacity factor at which the permittee anticipates operating each boiler based on all fuels fired and based on each individual fuel fired.

[40 CFR 60.48c(a)]

### 4.10 NSPS 40 CFR 60, Subpart Dc – Recordkeeping Requirements

- In accordance with 40 CFR 60.48c(g) and 40 CFR 60.48c(i), the permittee shall record and maintain records of the amount of each fuel combusted during each operating day by Boiler 1A, Boiler 2A, and Boiler 2.
- As an alternative to meeting the daily requirements, the permittee may elect to record and maintain records of the amount of each fuel combusted in each boiler during each calendar month.
- As an alternative to meeting the daily requirements, the permittee may elect to record and maintain records of the total amount of fuel delivered to that property during each calendar month.
- All records shall be maintained for a period of two years following the date of such record.

[40 CFR 60.48c(g),(i)]

## 5 Process A (Drying Process and Material Transfer Systems)

### Summary Description

The Basic American Foods Rexburg facility produces a variety of dehydrated food products for external customers and for internal use. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. Raw materials into the process are cooked potatoes, cooked foods, dehydrated foods, and additives, including sulfites. The processes addressed by this section are listed in Table 5.1 and include coolers, dryers, dehydration lines, and material transfer systems. Emissions of PM from each of these sources are uncontrolled. Material Recovery Units (MRUs), in the form of cyclones and fabric filters, are integral process equipment used to separate the pneumatically conveyed product from the air stream. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers. Process A was constructed in the early 1960's. This permitting action increases production limits of Process A from 61 T/day to 65 T/day.

- 5.1 Table 5.1 describes the devices used to control emissions from Process A.

Table 5.1 Process A Description

Emissions Units / Processes	Control Devices
Cooler/Dryer 7020 (Cooler vent)	None
Cooler/Dryer 7101 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None
Cooler/Dryer 7102 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None
Cooler/Dryer 7019 (Dryer, 6.6 MMBtu/hr, steam and natural gas)	None
Cooler/Dryer 7001 (Dryer, steam-heated)	None
Cooler/Dryer 7027 (Cooler)	None
Material Recovery Unit 7006	None

- 5.2 Table 5.2 contains only a summary of the requirements that apply to Process A. Specific permit requirements are listed below.

Table 5.2 Applicable Requirements Summary

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
5.3, 5.4–5.7	PM <sub>2.5</sub> /PM <sub>10</sub>	Limits as specified in Table 5.3	P-2011.0132	5.4–5.6
5.4	Throughput	65 T/day	P-2011.0132	5.6–5.7

## Emission Limits

### 5.3 PM<sub>10</sub> Emission Limits

Emissions from the drying process and material transfer system stacks shall not exceed any corresponding emissions rate limits listed in the following table.

**Table 5.3 Drying Process and Material Transfer System PM<sub>10</sub> Emission Limits<sup>(a)</sup>**

Source Description		PM <sub>2.5</sub> <sup>(b)</sup>	PM <sub>10</sub> <sup>(c)</sup>	NO <sub>x</sub>
		lb/hr <sup>(d)</sup>	lb/hr <sup>(d)</sup>	lb/hr <sup>(d)</sup>
Cooler/Dryer stack 7101	Cooler/Dryer 7101	2.345	2.345	0.332
	Emissions from AMUs allocated to Cooler/Dryer 7101 stack	0.019	0.019	0.156
Cooler/Dryer stack 7102	Cooler/Dryer 7102	2.345	2.345	0.332
	Emissions from AMUs allocated to Cooler/Dryer 7102 stack	0.018	0.018	0.155
Cooler/Dryer stack 7019	Cooler/Dryer 7019	0.894	0.894	0.337
	Emissions from AMUs allocated to Cooler/Dryer 7019	0.013	0.013	0.113

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c) Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- d) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.

[PTC No. P-2011.0132, 12/06/19]

## Operating Requirements

### 5.4 Throughput Limits

The production of dried products, including additives, from Process A shall not exceed 65 tons per 24-hour work day.

[PTC No. P-2011.0132, 12/06/19]

### 5.5 Dryer Fuels

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

[PTC No. P-2011.0132, 12/06/19]

### 5.6 Process Identification

Process line A shall be identified by one or more signs posted on or near the process line. Each cooler or dryer shall also be identified in a manner that will allow an inspector to identify the equipment that corresponds to the equipment listed in the Process A Description table (Table 5.1).

[PTC No. P-2011.0132, 12/06/19]

## Monitoring and Recordkeeping Requirements

### 5.7 Throughput Monitoring

The permittee shall monitor and record, on a daily basis, the calendar date and the total product output of dried food products, in tons per day, from Process A. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day.

[PTC No. P-2011.0132, 12/06/19]

## 6 Process B (Drying Process and Material Transfer Systems)

### Summary Description

6.1 Table 6.1 describes the devices used to control emissions from Process B.

**Table 6.1 Process B Description**

Emissions Units / Processes		Control Devices	Emission Points
Material Recovery Unit 5034		None	5034
Cooler/Dryer 5037 (Cooler/dryer vent, dryer is steam heated)		None	5037
Cooler/Dryer 4000 (Dryer, steam heated)		None	4000
Cooler/Dryer 234/228 (Dryer, natural gas-fired, 16.1 MMBtu/hr)		None	234/228
Material Recovery Unit 707 (fabric filter)		None	707
Material Recovery Unit 725 (fabric filter)		None	725
Material Recovery Unit 8 (fabric filter)		None	8
Material Recovery Unit 5001		None	5001
Material Recovery Unit 5000 (fabric filter)		None	5000
Material Recovery Unit 432 (fabric filter)		None	432
Material Recovery Unit 322		None	322
Material Recovery Unit 572 (Vent from material recovery cyclone in animal feed load-out system)		None	572
Vegetable Dryer M33 (Dryer, natural gas-fired, 2.7 MMBtu/hr)		None	33
Vegetable Dryer M44 (Dryer, natural gas-fired, 2.75 MMBtu/hr)		None	44
Vegetable Dryer M56 (Dryer, natural gas-fired, 1.6 MMBtu/hr)		None	56
Vegetable Dryer M62 (Dryer, natural gas-fired, 1.6 MMBtu/hr)		None	62
Vegetable Dryer M86 (Dryer, steam heated)		None	86
Flake North (flake drum dryers #1 and #2)		A MicroMist Scrubber System	FLK_N
Flake South (flake drum dryers #3 and #4)		A MicroMist Scrubber System	FLK_S
Proctor 4 Belt Dryer	Stage A	Low-NO <sub>x</sub> burners	P4A
	Stages B, C, D		P4BCD

[PTC No. P-2011.0132, 12/06/19]

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

**Table 6.2 Applicable Requirements Summary**

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
6.3	PM <sub>2.5</sub> /PM <sub>10</sub>	Limits specified in Table 6.3	P-2011.0132	6.4-6.12
6.3	NO <sub>x</sub>	Limits specified in Table 6.3	P-2011.0132	6.4-6.9
6.4	Throughput	304 T/day	P-2011.0132	6.6, 6.9, 6.12

## Emission Limits

### 6.3 Emission Limits

Emissions from the drying process and material transfer system stacks shall not exceed any corresponding emissions rate limits listed in the following table.

**Table 6.3 Dryer Process and Material Transfer System Emissions Limits <sup>(a)</sup>**

Source Description		PM <sub>2.5</sub> /PM <sub>10</sub>	NO <sub>x</sub>
		lb/hr <sup>(b)</sup>	lb/hr <sup>(b)</sup>
Flake North MicroMist Scrubber System scrubber stack	Flake North (Flake Drum #1 and Flake Drum #2)	0.453	0.00
	Emissions from AMUs allocated to the scrubber stack	0.033	0.271
Flake South MicroMist Scrubber System scrubber stack	Flake South (Flake Drum #3 and Flake Drum #4)	0.453	0.00
	Emissions from AMUs allocated to the scrubber stack	0.033	0.271
Proctor 4 Belt Dryer	Stage A stack	Proctor 4 Belt Dryer Stage A	0.415
		Emissions from AMUs allocated to Stage A stack	0.013
	Stages BCD stack	Proctor 4 Belt Dryer Stages B, C, D	1.726
		Emissions from AMUs allocated to Stages BCD stack	0.013
Cooler/Dryer 4000 (Dryer, steam heated) exhaust	Cooler/Dryer 4000	1.720	
	Emissions from AMUs allocated to Cooler/Dryer 4000 exhaust	0.019	
Cooler/Dryer 228 exhaust	Cooler/Dryer 228	1.100	
	Emissions from AMUs allocated to Cooler/Dryer 228 exhaust	0.011	
Cooler/Dryer 234 exhaust (Second exhaust from dryer 228)	Cooler/Dryer 234	0.310	
	Emissions from AMUs allocated to Cooler/Dryer 234 exhaust	0.017	
Stack group 33,44, 56, 62, and 86	Stack group 33,44, 56, 62, and 86	0.860	
	Emissions from AMUs allocated to stack group 33,44, 56, 62, and 86	0.043	

a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.

b) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.

[PTC No. P-2011.0132, 12/06/19]

## Operating Requirements

### 6.4 Production Limits

The total production of dried products, including additives, from Process B shall not exceed 448 tons per 24-hour work day, including flake products. The flake line production shall not exceed 144 tons per 24-hour work day.

[PTC No. P-2011.0132, 12/06/19]

### 6.5 Dryer Fuels

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

[PTC No. P-2011.0132, 12/06/19]

## 6.6 Process Identification

Process line B shall be identified by one or more signs posted on or near the process line. Each cooler or dryer shall also be identified in a manner that will allow an inspector to identify the equipment that corresponds to the equipment listed in the Process B Description table (Table 6.1).  
[PTC No. P-2011.0132, 12/06/19]

## 6.7 MicroMist Scrubber System

The permittee shall install and operate two MicroMist scrubber systems each with 75% or more removal efficiency for all particulates, including PM<sub>10</sub> and PM<sub>2.5</sub>.

Each of the two MicroMist scrubber systems shall treat the exhaust from two steam-heated flake drum dryers of the four steam-heated drum dryers as described in Table 6.1.

[12/6/2019]

## 6.8 MicroMist Scrubber System Operating Parameters

Each scrubber's operating parameter shall be equal to or greater than the value obtained during the most recent performance test demonstrating compliance with the emissions limits. Until an initial performance test demonstrating compliance with emissions limits is completed, each scrubber's operating parameter shall be equal to or greater than the respective values specified in the following:

- The liquid flow rate to the spray lances at quench stage shall be equal to or greater than 315 gallons per minute (gpm).
- The pressure drop across the MicroMist Venturi (MMV) stage shall be maintained between 17 to 25 inches of water (iwg).
- The inlet liquid flow rate to MMV stage shall be equal to or greater than 328 gpm.

The permittee shall install and operate the monitoring devices to measure the above parameters.

[12/6/2019]

## Monitoring, Recordkeeping, and Reporting Requirements

### 6.9 Production Monitoring

The permittee shall monitor and record, on a daily basis, the calendar date and the total product output of dried food products including additives (known as "Production from New Inputs"), in tons per day, from Process B. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day.

### 6.10 MicroMist Scrubber System Operating Parameters Monitoring

The permittee shall monitor and record the following operating parameters for each MicroMist scrubber system once each week:

- The liquid flow rate to the spray lances at quench stage in gpm
- The pressure drop across the MicroMist Venturi (MMV) stage in inches of water.
- The inlet liquid flow rate to MMV stage in gpm.

[12/6/2019]

## Performance Testing Requirements

### 6.11 Initial Performance Test for PM<sub>10</sub>

Proctor 4 belt dryer

Within 180 days after initial startup of Proctor 4 belt dryer, the permittee shall conduct performance tests to measure PM<sub>10</sub> emissions from Proctor 4 belt dryer's two stacks to demonstrate compliance with the PM<sub>10</sub> emission limits for the two stacks and to verify the emissions factors used in the emissions inventories (EI) calculation for Proctor 4 belt dryer.

MicroMist scrubber system scrubber stack

Within 180 days after initial startup of flake production, the permittee shall conduct performance tests to measure PM<sub>10</sub> emissions from one MicroMist scrubber system scrubber stack (either Flake North or Flake South) to demonstrate compliance with the PM<sub>10</sub> emission limit for the scrubber stack and to verify the emissions factor used in the emissions inventories (EI) calculation for the flake drum dryers.

Tests shall be conducted in accordance with the procedures outlined in the performance testing requirements (Permit Conditions 2.26 through 2.30 and 6.12) or as otherwise approved by DEQ. The performance test monitoring parameters (Permit Condition 6.12) shall be recorded during each performance test run and included in the performance test report. The flake drum and dryer shall be operated at the worst-case normal production rate during the performance tests. A description of how this requirement was met shall be included in the performance test report.

[PTC No. P-2011.0132, 12/06/19]

### 6.12 Performance Test Monitoring

The permittee shall monitor and record the following parameters during each performance test:

- The production rate(s) from the specific Process B emissions unit(s) (i.e., flake drum dryers, or Proctor 4 belt dryer) tested in tons of product per hour (T/hr) during each test run.
- The liquid flow rate to the spray lances at quench stage in gpm during the flake drum dryer test. The liquid flow rate shall be monitored and recorded at least once every 15 minutes of sampling time.
- The pressure drop across the MicroMist Venturi (MMV) stage in iwg during the flake drum dryer test. The pressure drop shall be monitored and recorded at least once every 15 minutes of sampling time.
- The inlet liquid flow rate to MMV stage in gpm during the flake drum dryer test. The liquid flow rate shall be monitored and recorded at least once every 15 minutes of sampling time.

[PTC No. P-2011.0132, 12/06/19]

## 7 Plant Space Heaters

### Emission Limits

#### 7.1 Process Description

The BAF Rexburg Facility has numerous existing space heaters ranging in size from less than 100,000 Btu/hr to 8.8 MMBtu/hr, with a total combustion capacity of 30.8 MMBtu/hr. Most of the units provide direct heating; i.e., the combustion air from the unit is discharged directly into the room to provide heating. In addition, in 2014 BAF installed Reyco unit (RX-OBI1), a natural-gas fired space heater rated at 13.3 MMBtu/hr. New air makeup units at a total rate of 19.6 MMBtu/hr are proposed to be installed for this project.

[PTC No. P-2011.0132, 12/06/19]

#### 7.2 Emission Limits

Space heaters emissions are allocated to the process stacks used for modeling analysis. Emissions from plant space heaters are regulated in Table 5.3 and Table 6.3 of the permit and by Permit Condition 8.1.

[PTC No. P-2011.0132, 12/06/19]

## 8 Insignificant Activities

8.1 Table 8.1 lists the units or activities that are insignificant on the basis of size or production rate as provided by the permittee. The regulatory citation for units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b. There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the facility-wide permit conditions.

Table 8.1 Insignificant Activities

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Operation, loading, and unloading of storage tanks and storage vessels, with lids or other appropriate closures and less than 260-gallon capacity, heated only to the minimum extent necessary to avoid solidification.	1
Operation, loading and unloading of storage tanks not greater than 1,100-gallon capacity with lids, not containing hazardous air pollutants and with maximum vapor pressure of 550 mmHg.	2
Operation, loading and unloading of volatile organic compound storage tanks, 10,000-gallon capacity or less, with lids or other appropriate closure and vapor pressure not greater than 80 mmHg at 21°C.	3
Operation, loading and unloading storage of butane, propane, or liquefied petroleum gas (LPG), storage tanks vessel capacity under 40,000 gallons.	4
Combustion sources, less than 5 MMBtu/hr, exclusively using natural gas, butane, propane, and/or LPG.	5
Combustion source, not greater than 0.5 MMBtu/hr, if burning waste wood, wood waste, or waste paper.	8
Welding using not more than 1 T/day of welding rod.	9
“Parylene” coaters using less than 500 gallons of coating per year.	11
Printing and silk-screening, using less than 2 gal/day of a combination of inks, coatings, adhesives, fountain solutions, thinners, retarders, or nonaqueous cleaning solutions.	12
Water cooling towers, not using chromium-based corrosion inhibitors, not using barometric jets or condensers, not greater than 10,000 gal/min, and not in direct contact with gaseous or liquid process streams containing regulated air pollutants.	13
Industrial water chlorination, less than 20 million gal/day capacity.	16
Surface coating, using less than 2 gal/day.	17
Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than 5 MMBtu/hr.	18
Tanks, vessels, and pumping equipment, with lids or other appropriate closure, for storage or dispensing of aqueous solutions of inorganic salts, bases and acids, excluding solutions with: 99% or greater sulfuric or phosphoric acid; 77% or greater nitric acid; 30% or greater hydrochloric acid; or more than one liquid phase where the top phase is more than 1% VOC.	19
Equipment, with lids or other appropriate closure, used exclusively to pump, load, unload, or store high-boiling-point organic material, with initial boiling point not less than 150°C or vapor pressure not more than 5 mmHg at 21°C.	20
Milling and grinding activities (paste forms, if used, are less than 1% volatile organic compounds).	22
Rolling, forging, drawing, stamping, shearing, and spinning metals.	23
Dip-coating operations using materials with less than 1% VOC.	24
Surface coating, aqueous solution or suspension containing less than 1% VOC.	25
Cleaning and stripping activities and equipment, using solutions having less than 1% volatile organic compounds by weight (no acid cleaning or stripping on metal substrates).	26
Storage and handling of water based lubricants for metal working with organic content less than 10%.	27
Process A, Stack ID 7006 (material recovery unit)	27
Process A, Stack ID 7001 (cooler/dryer)	30
Process A, Stack ID 7027 (cooler/dryer)	30
Process B, Stack ID 5034 (material recovery unit)	30
Process B, Stack ID 707 (material recovery unit)	30

**Table 8.1 (continued)**

<b>Description</b>	<b>Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation</b>
Process B Stack ID 234 (dryer vent)	30
Process B, Stack ID 725 (material recovery unit)	30
Process B, Stack ID 8 (material recovery unit)	30
Process B, Stack ID 5001 (material recovery unit)	30
Process B, Stack ID 5000 (tank vent)	30
Process B, Stack ID 432 (material recovery unit)	30
Process B, Stack ID 322 (material recovery unit)	30
Process B, Stack ID 572 (material recovery unit)	30

[IDAPA 58.01.01.317.01(b)(i), 5/3/03]

## 9 General Provisions

### General Compliance

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

### Reopening

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

### Property Rights

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

### Information Requests

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

## Severability

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

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

## Changes Requiring Permit Revision or Notice

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

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

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

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

## Federal and State Enforceability

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

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

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

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

## Inspection and Entry

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

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

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

## New Applicable Requirements

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

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

## Fees

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

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

## Certification

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

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

## Renewal

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

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

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

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

## Permit Shield

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

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
  - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
  - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 5/1/94; IDAPA 58.01.01.325, 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

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

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

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

## Periodic Compliance Certification

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

- The compliance certifications for all emissions units shall be submitted annually from January 1<sup>st</sup> to December 31<sup>st</sup> or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
- The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit, including emissions limitations, standards, and work practices;
- The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
  - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
  - The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
  - The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
  - Such information as DEQ may require to determine the compliance status of the emissions unit.

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

[IDAPA 58.01.01.322.11, 4/6/05; 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

9.24 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

## No Tampering

9.25 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

## **Semiannual Monitoring Reports**

- 9.26** In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1<sup>st</sup> to June 30<sup>th</sup> and July 1<sup>st</sup> to December 31<sup>st</sup>. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

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

## **Reporting Deviations and Excess Emissions**

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

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

## **Permit Revision Not Required**

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

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

## **Emergency**

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

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]