



**Air Quality
TIER I OPERATING PERMIT**

State of Idaho
Department of Environmental Quality

PERMIT No.: T1-2011.0115

FACILITY ID No.: 055-00018

AQCR: 62

CLASS: A

UTM ZONE: 11

SIC: 2493

NAICS: 321219

UTM COORDINATE (km): 506.7 E, 5283.5 N

1. PERMITTEE

Plummer Forest Products, Inc.

2. PROJECT

Project No. 60894 Tier I Operating Permit Renewal

3. MAILING ADDRESS

401 N. Potlatch Road

CITY

Post Falls

STATE

ID

ZIP

83877

4. FACILITY CONTACT

Jeff Carlson

TITLE

Safety and Environmental
Coordinator

TELEPHONE

(208) 773-7521

5. RESPONSIBLE OFFICIAL

Todd Brinkmeyer

TITLE

President

TELEPHONE

(208) 773-7521

6. EXACT PLANT LOCATION

401 North Potlatch Road, Post Falls, Idaho

COUNTY

Kootenai

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Particleboard Manufacturing

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit 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 effective date of this permit is the date of signature by DEQ on the cover page.

ERIC CLARK, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:	Proposed
DATE MODIFIED/AMENDED:	
DATE EXPIRES:	

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per year
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year

TAP	toxic air pollutants
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compounds
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter

1. TIER I OPERATING 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.

The purpose of this permitting action is to renew the Tier 1 Operating permit. Federal regulations have been added into this renewal. This includes 40 CFR 63, Subpart ZZZZ and Subpart JJJJJ. A CAM Plan in accordance with 40 CFR 64 was added for the Sander-dust Boiler. Other CAM related requirements for material handling were removed as all baghouses were considered process equipment rather than control equipment and no emissions units exceeded 100 T/yr.

1.2 This Tier I permit incorporates the following permit(s):

- PTC letter issued on January 10, 1974
- Permit to Construct No. P-2010.0042, Project 60912, issued **TBD**

1.3 This Tier I operating permit supersedes the following permit(s):

- Tier I Operating Permit No. T1-2010.0040, issued April 22, 2010

Regulated Sources

1.4 Table 1.1 lists all sources of emissions regulated in this Tier I operating permit.

Table 1.1 REGULATED SOURCES

Permit Section	Source Descriptions	Emission Control
5	Drag Chain and Drag Chain Baghouse BH-1	None
5	Rotex Screens #1, #2; Hammermills, Hammermill Cyclone and Baghouse BH-2	None
5	Outside Dry Silo	Outside Silo High Pressure Air System Baghouse BH-4
5	Blender, Former and Scalper Air System Baghouse BH-5	None
5	Board Cooler; Process Fugitives, Rip and Trim Saws	East Sawline Baghouse BH-9 West Sawline Baghouse BH-10
5	Board Trim and Reclaim Baghouse BH-3	None
5	Sanderdust Storage Silo	Sanderdust Storage Silo Baghouse BH-6
5	Sander Air System Baghouse BH-7	None
5	Sanderdust Overs Baghouse BH-8	None
3	Boiler	Electrostatic Precipitator
5	Particle Dryer	Multiclone
5	Press	None
6	Fire Pump Engine	None

[PTC No. P-2010.0042, Proposed]

2. FACILITY-WIDE CONDITIONS

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

Table 2.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	Fugitive emissions	Reasonable control	IDAPA 58.01.01.651	2.2, 2.3, 2.4, 2.12
2.5	Odors	Reasonable control	IDAPA 58.01.01.776.01	2.6, 2.12
2.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.12
2.9	Excess emissions	Compliance with IDAPA 58.01.01.120-126	IDAPA 58.01.01.120-126	2.9-2.9.5, 2.12
2.10	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	2.11, 2.12
2.11	Air quality standards	EPA reference test methods	IDAPA 58.01.01.157	2.10, 2.12
2.14	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600.616	2.12
2.15	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.12
2.16	Risk management	Compliance with IDAPA 58.01.01.322 and 40 CFR 68	IDAPA 58.01.01.322; 40 CFR 68	2.12

Fugitive Dust

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.
[IDAPA 58.01.01.650-651, 3/30/07]
- 2.2 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 dust emissions.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust 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 dust 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 dust emissions, and the date the corrective action was taken.

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (state only), 5/1/94]

- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date 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

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

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

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

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

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 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Excess Emissions

Excess Emissions - General

- 2.9 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 Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.
- 2.9.1 The person responsible for or in charge of a facility during an excess emissions event 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, Scheduled Maintenance

- 2.9.2 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 owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

- A prohibition of 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 owner or operator demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.

[IDAPA 58.01.01.133.01.a, 3/20/97]

[IDAPA 58.01.01.133.01.b, 4/5/00]

- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

Excess Emissions – Upset, Breakdown, or Safety Measures

- 2.9.3 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 owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/11/06]

2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall 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.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall 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 owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator 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 facility owner or operator.

[IDAPA 58.01.01.134.03 4/5/00]

Excess Emissions – Reporting and Recordkeeping

2.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator 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 58.01.01.135.01 and 02, 4/11/06]

2.9.5 The owner or operator 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:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

- 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

[IDAPA 58.01.01.136.03.a, 4/5/00]

- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

Performance Testing

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

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

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

Unless a longer time is approved by DEQ, the permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422 Fax: (208) 769-1404

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

Test Methods

- 2.11 If testing is required, the permittee shall use the test methods listed in Table 2.2 to measure the pollutant emissions.

Table 2.2 EPA REFERENCE TEST METHODS

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a EPA Method 202	
PM	EPA Method 5	
CO	EPA Method 10	
VOC	EPA Method 25 or 25A	VOCs shall be expressed as carbon
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.
Formaldehyde	Method 0011 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA Publication No. SW-846) for formaldehyde; OR the NCASI Method CI/WP-98.01 (IBR, see § 63.14(f)); OR the NCASI Method IM/CAN/WP-99.02 (IBR, see § 63.14(f)).	
Methanol	Method 308 in appendix A to 40 CFR part 63; OR Method 320 in appendix A to 40 CFR part 63; OR the NCASI Method CI/WP-98.01 (IBR, see § 63.14(f)); OR the NCASI Method IM/ CAN/WP-99.02 (IBR, see § 63.14(f)).	
Total HAP	Method 320 in appendix A to 40 CFR part 63; OR the NCASI Method IM/CAN/WP-99.02 (IBR, see § 63.14(f)); OR ASTM D6348-03 (IBR, see § 63.14(b)) provided that percent R in Annex A5 of ASTM D6348- 03 is equal or greater than 70% and less than or equal to 130%.	

*Or a DEQ-approved alternative in accordance with IDAPA 58.01.01.157

Monitoring and Recordkeeping

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

[IDAPA 58.01.01.322.07, 5/1/94]

Reports and Certifications

- 2.13** 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
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

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

Open Burning

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

[IDAPA 58.01.01.600-623, 05/08/09]

Asbestos

- 2.15** The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M – Asbestos.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 2.16** An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance 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

- 2.17** The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

NSPS/NESHAP General Provisions

2.18 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"> <u>All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart GG shall be submitted to:</u> Coeur d’Alene Regional Office Department of Environmental Quality 2110 Ironwood Pkwy Coeur d’Alene, ID 83814
60.7(a),(b), and (f)	Notification and Recordkeeping	<ul style="list-style-type: none"> Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date. Notification shall be furnished of initial startup postmarked within 15 days of such date. Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made. 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. 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.
60.8	Performance Tests	<ul style="list-style-type: none"> At least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present. 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. Performance testing facilities shall be provided as follows: Sampling ports adequate for test methods applicable to such facility. Safe sampling platform(s). Safe access to sampling platform(s). Utilities for sampling and testing equipment. Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f).
60.11(a),(c), (d), (f), and (g)	Compliance With Standards and Maintenance Requirements	<ul style="list-style-type: none"> When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8. 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. 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. The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided.
60.12	Circumvention	<ul style="list-style-type: none"> 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.
60.14	Modification	<ul style="list-style-type: none"> 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. Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.
60.15	Reconstruction	<ul style="list-style-type: none"> 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.

[40 CFR 60, Subpart A]

2.19 **NESHAP 40 CFR 63, Subpart A – General Provisions**

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

Section	Subject	Summary of Section Requirements								
63.13	Addresses	<ul style="list-style-type: none"> All requests, reports, applications, submittals, and other communications associated with 40 CFR 63, Subpart(s) shall be submitted to: <table border="0" style="margin-left: 40px;"> <tr> <td style="text-align: center;">Director Air and Waste</td> <td style="text-align: center;">Coeur d’Alene Regional Office</td> </tr> <tr> <td style="text-align: center;">US EPA</td> <td style="text-align: center;">and Department of Environmental Quality</td> </tr> <tr> <td style="text-align: center;">1200 Sixth Avenue</td> <td style="text-align: center;">2110 Ironwood Pkwy</td> </tr> <tr> <td style="text-align: center;">Seattle, WA 98101</td> <td style="text-align: center;">Coeur d’Alene, ID 83814</td> </tr> </table> 	Director Air and Waste	Coeur d’Alene Regional Office	US EPA	and Department of Environmental Quality	1200 Sixth Avenue	2110 Ironwood Pkwy	Seattle, WA 98101	Coeur d’Alene, ID 83814
Director Air and Waste	Coeur d’Alene Regional Office									
US EPA	and Department of Environmental Quality									
1200 Sixth Avenue	2110 Ironwood Pkwy									
Seattle, WA 98101	Coeur d’Alene, ID 83814									
63.4(a)	Prohibited Activities	<ul style="list-style-type: none"> 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. 								
63.4(b)	Circumvention/ Fragmentation	<ul style="list-style-type: none"> 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. 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). 								
63.6(b) and (c)	Compliance Dates	<ul style="list-style-type: none"> The permittee of any new or reconstructed source must comply with the relevant standard as specified in 40 CFR 63.6(b). 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). 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). 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). 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). 								
63.6(e) and (f)	Compliance with Standards and Maintenance Requirements (Non-Opacity)	<ul style="list-style-type: none"> 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). 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 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. 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). 								
63.6(h)	Compliance with Standards	<ul style="list-style-type: none"> The opacity and visible emission standards must apply at all times except during periods of startup, shutdown, and malfunction, and as otherwise specified in accordance with 40 CFR 63.6(h). 								

	<p>and Maintenance Requirements (Opacity)</p>	<ul style="list-style-type: none"> • The permittee shall notify in writing of the anticipated date for conducting opacity or visible emission observations in accordance with 40 CFR 63.9(f), if such observations are required, in accordance with 40 CFR 63.6(h)(4). • For the purpose of demonstrating initial compliance, opacity or visible emission observations shall be conducted in accordance with 40 CFR 63.6(h)(5). • The permittee shall make records available upon request and shall provide evidence indicating proof of current visible observer emission certification in accordance with 40 CFR 63.6(h)(6).
63.7	<p>Performance Testing Requirements</p>	<ul style="list-style-type: none"> • 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). • 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). • 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. • 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"> Sampling ports adequate for test methods applicable to such source. Safe sampling platform(s); Safe access to sampling platform(s); Utilities for sampling and testing equipment; and Any other facilities deemed necessary for safe and adequate testing of a source. • Performance tests shall be conducted and data reduced in accordance with 40 CFR 63.7(e) and (f). • 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).
63.9	<p>Notification Requirements</p>	<ul style="list-style-type: none"> • 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"> The name and address of the permittee; The address (i.e., physical location) of the affected source; An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date; 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 A statement of whether the affected source is a major source or an area source. • 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"> 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; A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date. • 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"> 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 A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date. <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>

		<ul style="list-style-type: none"> • 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. • 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. • 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"> The methods that were used to determine compliance; 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; The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods; 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; 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); 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 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. • 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. • 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. • If an 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). • 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).
63.10	Recordkeeping and Reporting Requirements	<ul style="list-style-type: none"> • 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. • The permittee shall maintain relevant records of the following in accordance with 40 CFR 63.10(b)(2); <ul style="list-style-type: none"> 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; The occurrence and duration of each malfunction of operation or the required air pollution control and monitoring equipment; All required maintenance performed on the air pollution control and monitoring equipment; 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 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; 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

		<p>events);</p> <p>Each period during which a CMS is malfunctioning or inoperative (including out-of-control periods);</p> <p>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);</p> <p>All results of performance tests, CMS performance evaluations, and opacity and visible emission observations;</p> <p>All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;</p> <p>All CMS calibration checks;</p> <p>All adjustments and maintenance performed on CMS;</p> <p>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</p> <p>All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.</p> <ul style="list-style-type: none"> • 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).
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[40 CFR 63, Subpart A]

Incorporation of Federal Requirements by Reference

2.20 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
- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63

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

3. EMISSIONS UNIT GROUP 1 – SANDER-DUST BOILER

Summary Description

Table 3.1 describes the devices used to control emissions from the sander-dust boiler.

Table 3.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Kipper and Sons Sander-Dust Boiler	Multiclone and Electrostatic Precipitator

Table 3.2 contains only a summary of the requirements that apply to the sander-dust boiler. Specific permit requirements are listed below Table 3.2.

Table 3.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
3.1	PM	0.200 gr/dscf at 8% O ₂ 0.015 gr/dscf at 3% O ₂	IDAPA 58.01.01.677	3.3, 3.4, 3.5, 3.8, 3.9, 3.10
3.2	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	3.7, 3.8, 3.9, 3.10
3.3	Steam Production Rate	120% of the steam production rate measured in the most recent performance test	IDAPA 58.01.01.322.01	3.6

Permit Limits/Standard Summary

- 3.1 The permittee shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of the concentrations shown in Table 3.3.

Table 3.3 APPLICABLE REQUIREMENTS SUMMARY

Fuel type	Allowable particulate emissions	Percent oxygen
Wood	0.200 gr/dscf	8%
Gas	0.015 gr/dscf	3%

The effluent gas shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.677, 5/1/94]

- 3.2 The permittee shall not discharge any air pollutant to the atmosphere from any point of emissions for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

- 3.3 The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart JJJJJ and all applicable general provisions of 40 CFR 63 Subpart A.

Subpart JJJJJ applies to existing industrial boilers located at area source of HAP emissions. Subpart JJJJJ applies to the existing Sanderdust boiler.

[40 CFR 63.11193, 11194]

3.4 **Compliance Dates**

In accordance with 40 CFR 63.11196(a), the permittee must comply with the work practice or management practice standard of a tune-up of the National Emissions Standards for Hazardous Air Pollutants for Industrial Boilers Area Sources, 40 CFR 63, Subpart JJJJJJ by March 21, 2012 and achieve compliance with the energy assessment requirement by March 21, 2014.

[40 CFR 63.11196(a)]

Operating Requirements

3.5 **Work Practice Standards, Emission Reduction Measures, and Management Practices**

In accordance with 40 CFR 63.11201(b), the permittee must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment that meets or is amended to meet the energy assessment requirements in Table 2 of this subpart satisfies the energy assessment requirement. The energy assessment must include:

- A visual inspection of the boiler system,
- An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,
- Inventory of major systems consuming energy from affected boiler(s),
- A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
- A list of major energy conservation measures,
- A list of the energy savings potential of the energy conservation measures identified,
- A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

[40 CFR 63.11201(b)]

3.6 **General Compliance Requirements**

In accordance with 40 CFR 63.11205(a), at all times 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.

[40 CFR 63.11205(a)]

3.7 **Initial Compliance Demonstration**

In accordance with 40 CFR 63.11214(b), the permittee must conduct a performance tune-up according to §63.11223(b) and must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

In accordance with 40 CFR 63.11214(c), you must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed and submit, upon request, the energy assessment report.

[40 CFR 63.11214(b)-(c)]

3.8 **Continuous Compliance with Work Practice and Management Practice Standards**

In accordance with 40 CFR 63.11223(a-b), the permittee must conduct a biennial performance tune-up to demonstrate continuous compliance. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. The tune-up shall include:

- As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months).

- Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
- Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
- Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).
- Maintain onsite and submit, if requested by the Administrator, the biennial report containing the following information:
 - The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured 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 biennial tune-up of the boiler.
- If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.

[40 CFR 60.11223(a-b)]

3.9 The average maximum instantaneous steaming rate is defined as the running average of the three highest hourly instantaneous steaming rates, as observed on the continuous chart recording. The average maximum instantaneous steaming rate shall be maintained at or below 120% of the average steaming rate attained during the most recent performance test conducted pursuant to the permit that demonstrated compliance with Permit Condition 3.1. If the tested emission rate is above 0.167 grains per dry standard cubic foot at 8% oxygen, when combusting wood product, the maximum average instantaneous steaming rate shall be limited to the steaming rate obtained by the following equation:

- Max. allowable avg. instantaneous steam rate =

$$\frac{(\text{avg. steam rate during test} \times 0.20 \text{ gr/dscf at 8\% oxygen})}{(\text{tested grain loading at 8\% oxygen})}$$

Except during performance tests conducted to establish compliance at a higher steaming rate, whenever the steaming rate exceeds the allowable steaming rate, the permittee shall take corrective action within a reasonable time but no longer than 24 hours from the discovery of the exceedance to bring the steaming rate to the allowable rate or below.

[IDAPA 58.01.01.322.01, 3/19/99]

3.10 While combusting wood products, the permittee shall conduct a PM performance test at maximum desired operating capacity in accordance with the procedures outlined in 40 CFR Part 60, Appendix A, Method 5, or a DEQ-approved alternative method, as provided in Permit Condition 2.11. The test shall be performed during the first 12 months of the permit term to demonstrate compliance with Permit Condition 2.1.

The permittee shall monitor and record the steam production rate of the boiler during each test. A visible emissions evaluation shall be performed during each performance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.

If the particulate grain loading measured in the initial performance test is less than or equal to 75% of the emissions standard in IDAPA 58.01.01.677, no further testing shall be required during the permit term. If the particulate grain loading measured during the performance test is greater than 75%, but less

than or equal to 90% of the emissions standard in IDAPA 58.01.01.677, a second test shall be required in the third year of the permit term. If the particulate grain loading measured during the performance test is greater than 90% of the emissions standard in IDAPA 58.01.01.677, the permittee shall conduct a performance test annually.

[IDAPA 58.01.01.322.06, 5/1/94; IDAPA 58.01.01.322.09, 5/1/94]

3.11 The sander-dust boiler shall be fueled exclusively by wood products and natural gas.

[IDAPA 58.01.01.322.01, 3/19/99]

3.12 An O&M manual shall be developed within 60 days of issuance of this permit. The O&M manual shall be updated as necessary and shall include, at a minimum, the most recent general descriptions of the equipment; the normal operating conditions and procedures for the boiler; startup, shutdown, and maintenance procedures; upset conditions guidelines; and corrective action procedures.

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

3.13 The permittee shall at all times maintain in good working order and operate, as efficiently as practicable, the Sander-dust boiler.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

3.14 The boiler steam shall not be superheated and the maximum pressure shall be limited to 300 psi absolute, by means of a pressure relief valve which bears the "Valve Repair (VR) Stamp" of a certified valve repair company that is recognized by the loss-prevention insurance carrier. The stamp on the pressure relief valve and associated documentation shall be maintained onsite and shall be made available for review by DEQ representatives upon request.

[PTC 1/10/74]

Monitoring and Recordkeeping Requirements

3.15 The permittee shall install, operate, calibrate, and maintain a device to continuously monitor and record the steam production rate of the sander-dust boiler. At least once per day, the maximum instantaneous steaming rate achieved during each hour of operation shall be recorded and compared to the maximum allowable average instantaneous steaming rate. During any period of time that the hourly instantaneous rate is higher than the maximum allowable rate, a running three-hour average instantaneous steaming rate will be calculated. If this running three-hour average rate exceeds the maximum allowable steaming rate, corrective action will be taken, as required in Section 3.3. If the continuous steaming rate measurement system becomes inoperable, a backup monitoring method consisting of manual hourly instantaneous readings or calculations shall be implemented within 96 hours of the continuous steaming rate measurement system becoming inoperable, and shall be used until the original system is operational.

[IDAPA 58.01.01.322.06, 5/1/94].

3.16 The permittee shall conduct monthly one-minute observations of each affected emissions point or source using EPA Method 22 (in 40 CFR Part 60, Appendix A). If visible particulate matter emissions are observed for any emissions point, a six-minute observation using EPA Method 9 shall be conducted. The visible emissions evaluation shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and maintained as required in Permit Condition 2.12. If four consecutive monthly Method 22 observations indicate that no visible particulate matter emissions are observed from any of the four observations or if four consecutive monthly six-minute observations using Method 9 indicate that opacity is below 20% for each of the four six-minute observations, or any combination of four consecutive monthly Method 22 or Method 9 observations, the frequency of observations decreases to once per quarter. If any quarterly Method 9 observation indicates opacity is greater than 20%, the observation frequency reverts to monthly.

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

3.17 **Recordkeeping Requirements**

In accordance with 40 CFR 63.11225(c), the permittee must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 as specified below.

- 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.
- Records documenting the fuel type(s) used monthly by each boiler, including, but not limited to, a description of the fuel, including whether the fuel has received a non-waste determination by you or EPA, and the total fuel usage amount with units of measure. If you combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1), you must keep a record which documents how the secondary material meets each of the legitimacy criteria. If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4), you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c), you must keep a record that documents how the fuel satisfies the requirements of the petition process.

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 §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

[40 CFR 63.11225(c)]

Reporting Requirements

3.18 Notification and Reporting Requirements

In accordance with 40 CFR 63.11225(a)(4), the permittee must submit the Notification of Compliance Status in accordance with §63.9(h) no later than 120 days after the applicable compliance date specified in §63.11196. In addition to the information required in §63.9(h)(2), your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

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

In accordance with 40 CFR 63.11225(b), you must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the following information: For boilers that are subject only to a requirement to conduct a biennial tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial compliance report instead of a semi-annual compliance report. The report must be submitted by March 15 if you had any instance described by the third bullet below.

- Company name and address.
- Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.
- If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

[40 CFR 63.11225(a-b)]

3.19 The permittee shall submit a performance test report to DEQ as specified in Permit Condition 2.10.

[IDAPA 58.01.01.322.08, 5/1/94]

4. EMISSIONS UNIT GROUP 2 – TEMPORARY BOILER

Summary Description

Table 4.1 describes the devices used to control emissions from the temporary boiler.

Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Propane- or natural gas-fired boiler	None

Table 4.2 contains only a summary of the requirements that apply to the temporary boiler. Specific permit requirements are listed below Table 4.2.

Table 4.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
4.1	PM	0.015 gr/dscf at 3% O ₂	IDAPA 58.01.01.676	4.3, 4.5
4.2	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period.	IDAPA 58.01.01.625	4.3, 4.5
4.4	NSPS fuel use log	Amount of fuel burned each day	40 CFR 60.48c(g)	2.12, 2.12

Permit Limits/Standard Summary

- 4.1 The permittee shall not discharge to the atmosphere from any fuel burning equipment with a maximum rated input of 10 MMBtu/hr, or more, and commencing operation on or after October 1, 1979, PM in excess of the concentrations shown in Table 4.3.

Table 4.3 Allowable Particulate Matter Emissions

Fuel type	Allowable particulate emissions	Percent oxygen
Gas	0.015 gr/dscf	3%

The effluent gas shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.676, 5/1/94]

- 4.2 The permittee shall not discharge any air pollutant to the atmosphere from any point of emissions for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

- 4.3 The permittee shall record the amounts of fuel combusted during each day.

[40 CFR 60.48c(g)]

- 4.4 The permittee shall maintain the records required by Permit Condition 4.3 for a period of five years following the date of such record.

[IDAPA 58.01.01.322.07, 5/1/94]

Reporting Requirements

- 4.5 If the temporary boiler is operated for the first time at this Plummer Forest Products facility, the permittee shall comply with the notification requirements of 40 CFR 60.48c(a).

[40 CFR 60.48c(1)]

5. EMISSIONS UNIT GROUP 3 – WOOD HANDLING, DRYING, AND PRESSING

Summary Description

Table 5.1 describes the devices used to control emissions from drying and pressing.

Table 5.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Drag Chain and Drag Chain Baghouse BH-1	None
Rotex Screens #1, #2; Hammermills, Hammermill Cyclone and Baghouse BH-2	None
Outside Dry Silo	Outside Silo High Pressure Air System Baghouse BH-4
Blender, Former and Scalper Air System Baghouse BH-5	None
Board Cooler; Process Fugitives, Rip and Trim Saws	East Sawline Baghouse BH-9 West Sawline Baghouse BH-10
Board Trim and Reclaim Baghouse BH-3	None
Sanderdust Storage Silo	Sanderdust Storage Silo Baghouse BH-6
Sander Air System Baghouse BH-7	None
Sanderdust Overs Baghouse BH-8	None
Boiler	Electrostatic Precipitator
Particle Dryer	Multiclone
Press	None

Table 5.2 contains only a summary of the requirements that apply to the drying and pressing. Specific permit requirements are listed below Table 5.2.

Table 5.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
5.1	PM	Process weight	IDAPA 58.01.01.702	5.6, 5.7
5.2	HAP	Facility-wide HAP emissions shall be less than 10 T/yr per any consecutive 12-month period for any single HAP.	PTC P-2010.0042, Project 60912	5.5, 5.7, 5.8
5.2	HAP	Facility-wide HAP emissions shall be less than 25 T/yr per any consecutive 12-month period for any combination of HAPs.	PTC P-2010.0042, Project 60912	5.5, 5.7, 5.8
5.3	Visible emissions	20% Opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	5.6

Permit Limits/Standard Summary

- 5.1** The permittee shall not discharge to the atmosphere from any source operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E I s the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour:
- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.6}$$
 - b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

5.2 Facility-Wide HAP Emissions Limits

- Facility-wide HAP emissions shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.
- Facility-wide HAP emissions shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.

[PTC No. P-2010.0042, Proposed]

5.3 The permittee shall not discharge any air pollutant to the atmosphere from any point of emissions for a period or periods aggregating more than three minutes in any 60-minute period which has greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

5.4 HAP Emissions Potential Increase

Should there be a physical change or change in method of operation of any stationary source which results in an emission increase or which results in the emission of any regulated air pollutant not previously emitted a PTC modification application or an exemption determination shall be submitted to DEQ.

[PTC No. P-2010.0042, Proposed]

Monitoring and Recordkeeping Requirements

5.5 Furnish Usage Records

For the particleboard process, the permittee shall monitor and record monthly the furnish usage of the process. The furnish usage records shall remain on site for the most recent two year period and shall be made available to DEQ representatives upon request.

[PTC No. P-2010.0042, Proposed]

5.6 HAPs Monitoring Requirements

The permittee shall monitor and record the monthly and annual HAP emissions from the press vents and East & West Sawline baghouses using the emission factors and furnish usage records required by Permit Conditions 5.4 and 5.5, respectively, to demonstrate compliance with the Facility-Wide HAPs Emission Limit Permit Condition. The permittee shall monitor and record the monthly and annual HAP emissions from sander air system, particle dryer, and boiler using the furnish usage records required by Permit Condition 5.5 to demonstrate compliance with the Facility-Wide HAPs Emission Limit Permit Condition. Annual facility-wide HAP emissions, expressed in tons per year (TPY), shall be determined by summing monthly HAP emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent two year period and shall be made available to DEQ representatives upon request.

[PTC No. P-2010.0042, Proposed]

5.7 Control System Procedures

Within 60 days of permit issuance, the permittee shall have developed a Control System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from the baghouses, transfer point boots/enclosures, and potential transfer point water sprays. The Control System Procedures document shall be a permittee developed document independent of the manufacturer-supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Control System Procedures document shall describe the procedures that will be followed to comply with the maintenance General Provision and shall contain requirements for weekly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Control System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at any time. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.
- Air to Cloth Ratio Certification

The Control System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the material transfer points at any time. At a minimum the document shall include:

- Procedures to determine if spray bar is functioning properly; and
- Procedures to determine if the water spray bar is appropriate for the application and secured in place.

The Control System Procedures document shall also include, at a minimum, the following methodology used by the facility to handle fugitive dust emissions:

- Use, where practical, of water, or chemical dust suppressant, for control of dust generated as a result of material handling or processing;
- Application of water, or chemical dust suppressant, by hardpiped, conical deluge, or mist, application systems, or equivalent;
- Application and use, where practical and as specified in the application materials, of shrouding of material transfer points;
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Containment methods shall be employed during mixing or drop operations;

The permittee shall maintain records of the results of each control system inspections in accordance with Recordkeeping General Provision. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The Control System Procedures document shall be submitted to DEQ within 60 days of permit issuance to remain on file and shall contain a certification by a responsible official. A copy shall also remain on site. Any permittee or DEQ requested changes to the Control System Procedures document shall be submitted within 15 days of the change.

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, Idaho 83814

The Control System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the Control System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[PTC No. P-2010.0042, Proposed]

- 5.8** The permittee shall conduct weekly one-minute observations of each affected emissions point or source using EPA Method 22 (in 40 CFR Part 60, Appendix A). If visible particulate matter emissions are observed for any emissions point, a six-minute observation using EPA Method 9 shall be conducted. The visible emissions evaluation shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and maintained as required in Permit Condition 2.12. If four consecutive monthly Method 22 observations indicate that no visible particulate matter emissions are observed from any of the four observations or if four consecutive monthly six-minute observations using Method 9 indicate that opacity is below 20% for each of the four six-minute observations, or any combination of four consecutive monthly Method 22 or Method 9 observations, the frequency of observations decreases to once per quarter. If any quarterly Method 9 observation indicates opacity is greater than 20%, the observation frequency reverts to monthly.

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

6. EMISSIONS UNIT GROUP 4 – EMERGENCY FIRE PUMP ENGINE

Summary Description

Table 6.1 describes the devices used to control emissions from the fire pump engine.

Table 6.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Fire pump engine	None

Table 6.2 contains only a summary of the requirements that apply to the fire pump engine. Specific permit requirements are listed below Table 6.2.

Table 6.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
6.1	Fuel sulfur content	ASTM Grade 1 fuel oil – 0.3% by weight ASTM Grade 2 fuel oil – 0.5% by weight	IDAPA 58.01.01.728	2.12
6.2	Allowable fuel	ASTM Grade 1 or 2 fuel oil	IDAPA 58.01.01.322.01	2.12
6.3	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8

Permit Limits/Standard Summary

6.1 The permittee shall not sell, distribute, use or make available for use, any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil – 0.3% by weight
- ASTM Grade 2 fuel oil – 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

6.2 The fire pump engine shall be fueled exclusively by ASTM Grade 1 fuel oil or ASTM Grade 2 fuel oil.

[IDAPA 58.01.01.322.01, 3/19/99]

6.3 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 this section.

[IDAPA 58.01.01.625, 4/23/99]

- The appropriate test method under this section shall be EPA Method 9 (contained in 40 CFR Part 60) with the method of calculating opacity exceedances altered as follows:

[IDAPA 58.01.01.625.04, 11/12/98]

- Opacity shall be determined by counting the number of readings in excess of the percent opacity limitation, dividing this number by four (each reading is deemed to represent 15 seconds) to find the number of minutes in excess of the percent opacity limitation per IDAPA 16.01.01.625.

[IDAPA 58.01.01.625.04, 4/23/99]

6.4 The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart ZZZZ and all applicable general provisions of 40 CFR 63 Subpart A.

Subpart ZZZZ applies to the existing stationary Reciprocating Internal Combustion Engine (RICE) located at area source of HAP emissions. Subpart ZZZZ applies to the existing emergency compression ignition with a rated capacity of 208 bhp. Plummer Forest Products, Inc. maintains a Cummins, 6BTA5.9-F1, 208 bhp compression ignition engine onsite for emergency purposes.

[40 CFR 63.6585]

6.5 **Compliance Date**

In accordance with 40 CFR 63.6595(a)(1), the permittee must comply with the applicable emission and operating limitations of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ by May 3, 2013.

[40 CFR 63.6595(a)(1)]

Operating Requirements

6.6 **Emissions and Operating Limitations**

In accordance with 40 CFR 63.6603(a), on and after May 3, 2013, the following emission limits or operating restrictions are required for the engine. The permittee must meet the following requirements, except during periods of startup.

- Change oil and filter every 500 hours of operation or annually, whichever comes first.
- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6603(a)]

6.7 On and after May 3, 2013, the permittee shall operate and maintain the diesel engine(s) and associated pollution control equipment (where applicable) in a manner that minimizes emissions. Nothing further is required to reduce emissions other than what is necessary to meet the appropriate limitation in the Emissions Limitations permit condition in accordance with 40 CFR 63.6605.

[40 CFR 63.6605]

Monitoring and Maintenance Requirements

6.8 In accordance with 63.6625(e)(3) and Table 6 of the subpart, on and after May 3, 2013, the permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e)(3)]

6.9 In accordance with 63.6625(f), on and after May 3, 2013, an existing emergency stationary RICE located at an area source of HAP emissions must install a non-resettable hour meter if one is not already installed.

[40 CFR 63.6625(f)]

6.10 On and after May 3, 2013, the engine's time spent at idle during startup shall be minimized to a period needed for appropriate and safe loading of the engine, but not to exceed 30 minutes, after which time the emission standards associated with this permit apply in accordance with 40 CFR 63.6625(h).

[40 CFR 63.6625(h)]

6.11 In accordance with 40 CFR 63.6625(i), on and after May 3, 2013, the permittee has the option of implementing an oil analysis program to extend the specified oil change frequency in the Emissions and Operating Limitations permit condition. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil before continuing to use the engine. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

[40 CFR 63.6625(i)]

6.12 In accordance with 40 CFR 63.6640(f), the permittee must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii). The paragraphs are as follows:

- (i) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (ii) The permittee may operate the emergency RICE for the purposes of maintenance checks and readiness testing, provided the tests are recommended by Federal, State or local government, the manufacturer, the vendor or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year.
- (iii) The permittee may operate the emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hour per year provided for maintenance and testing.

[40 CFR 63.6640(f)]

Recordkeeping Requirements

6.13 In accordance with 40 CFR 63.6655(e), the permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following RICE; (1) an existing stationary emergency RICE, (2) an existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

In accordance with 40 CFR 63.6655(f), an existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If engines are used for demand response, the permittee must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

All records shall be readily accessible in hard copy or electronic form for a minimum of five (5) years after the date of each occurrence, measurement, maintenance procedure, corrective action or report in accordance with 40 CFR 63.6660.

[40 CFR 63.6655(e), 63.6660]

6.14 Any notifications or reporting required by the National Emission Standards for Hazardous Air Pollutants: Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ or Subpart A – General Provisions shall be submitted to the following address in accordance with 40 CFR 63.13:

Air Quality Permit Compliance
Coeur d'Alene Regional Office
Department of Environmental Quality
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

and

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[40 CFR 63.13]

7. COMPLIANCE ASSURANCE MONITORING – 40 CFR 64

Summary Description

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

Table 7.1 lists the emissions units and pollutants that are applicable to CAM and details the monitoring requirements for each emissions unit which the permittee shall comply with. The Table also specifies the specific values that are approved to determine when an excursion has occurred.

Emissions Unit: Sander-dust Boiler
 Regulated Pollutant(s): PM
 Emission Limit(s): PM - 0.200 gr/dscf at 8% O₂ when burning wood, IDAPA 58.01.01.677
 PM - 0.015 gr/dscf at 3% O₂ when burning gas, IDAPA 58.01.01.677

Table 7.1 COMPLIANCE ASSURANCE MONITORING REQUIREMENTS FOR THE SANDER-DUST BOILER

	Indicator No 1	Indicator No. 2
Indicator	Pressure Drop Across Multiclone	Secondary Voltage of ESP
Measurement Approach	The pressure differential gauge with operator readout will be used to measure the pressure drop.	The voltage applied by each T/R set to the discharge electrodes describes the indicator. A continuous voltage monitor with operator readout will be used to measure the voltage from each T/R set.
Indicator Range	An excursion is defined as a pressure outside 0.5 to 6.0 inches of water column.	An excursion is defined as a secondary voltage outside 15 to 65 kilovolts.
Performance Criteria	The pressure differential ports are located up and downstream of the cyclone array in the multiclone.	The voltage is measured using manufacturer instrumentation provided with the ESP unit.
Data Representativeness		
QA/QC Practices	Instrumentation is calibrated annually. It is observed daily; troubleshooting and maintenance will be initiated at any sign of questionably effective operation. Also, confirm that gauge reads zero when no flow through the unit.	Instrumentation is calibrated annually. It is observed daily; troubleshooting and maintenance will be initiated at any sign of questionably effective operation. Also, confirm that the meter reads zero when the ESP is not operating.
Monitoring Frequency	The pressure differential is monitored continuously and recorded a minimum of once per day.	The voltage is monitored and recorded hourly.
Data Collection Procedure	The pressure shall be recorded in the boiler operating log and maintained for a minimum of 5 years.	The voltage shall be recorded on ESP checklist hourly and maintained for a minimum of 5 years.
Averaging Period	Instantaneous (never to be exceeded)	Instantaneous (never to be exceeded)

CAM Recordkeeping

7.1 The permittee shall conduct the monitoring required under this permit upon issuance.

[40 CFR 64.7(a)]

7.2 At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[40 CFR 64.7(b)]

- 7.3 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 pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, 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)]**
- 7.4 Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- [40 CFR 64.7(d)]**
- 7.5 In accordance with 40 CFR 64.3(b), for the multiclone and Electrostatic Precipitator, if the manufacturer specifications for the monitoring devices for pressure drop and secondary voltage include calibration procedures but do not specify a calibration frequency, the device(s) shall be calibrated at least once each calendar year.
- [40 CFR 64.3(b)(1)(2)&(3)]**
- 7.6 An exceedance is defined as any measured emission of PM₁₀ or PM which exceeds any corresponding emissions limit specified for the emissions unit in Table 7.1.
- [40 CFR 64.6(c)(2)]**
- 7.7 In accordance with 40 CFR 64.7(e), if the owner or operator 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 owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V 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)]**
- 7.8 DEQ may require the owner or operator to develop and implement a quality improvement plan (QIP) in accordance with 40 CFR 64.8(a) if an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period occurs.
- [40 CFR 64.8(a)]**

7.9 The reports required by General Provision 24 and 25 shall include the following information for those emissions units affected by 40 CFR 64 and listed in Table 7.1:

- Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).

[40 CFR 64.9(a)(2)]

7.10 In accordance with 40 CFR 64.9(b), the owner or operator shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

[40 CFR 64.9(b)]

7.11 Should there be a conflict between 40 CFR 64 and Permit Conditions 7.1 through 7.10 of this permit, the 40 CFR 64 shall govern.

[IDAPA 58.01.01.322.02, 5/1/94]

8. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in Table 8.1 to qualify for a permit shield.

Table 8.1 INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
3,000 gallon diesel fuel tank	(3)
One 250-gallon motor oil tank	(1)
One 200-gallon tank ammonium sulfate solution	(19)
Diesel fuel pump	(2)
Maintenance shop welding	(9)
275-gallon diesel fuel tank for emergency fire pump diesel engine	(3)
15,000-gallon urea resin tank	(20)
15,000-gallon urea resin tank	(20)
15,000-gallon urea resin tank	(20)
Welding vents in the maintenance shop	(9)
6,000-gallon urea resin tank	(20)
10,000-gallon ISO resin tank	(20)
10,000-gallon ISO resin tank	(20)

- 8.1** There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

9. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

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)]
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)]
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

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)]**
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

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

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)]**

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. 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

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, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02;
40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

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 CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06;
40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

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) and (2)]

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

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

[Idaho Code §39-108; IDAPA 58.01.01.322.15.1, 5/1/94; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

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

16. The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

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

Certification

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

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

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

- b. 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

- 19. 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:
 - a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - i. 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.
 - b. 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).
 - c. Nothing in this permit shall alter or affect the following:
 - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;

IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;

IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- 20.
 - a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
 - b. 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.
 - c. 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.

- d. 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

21. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:
- a. The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
 - b. 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;
 - c. 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):
 - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator 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;
 - iii. 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
 - iv. Such information as the Department may require to determine the compliance status of the emissions unit.
 - d. 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

22. 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

23. 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

24. 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 to June 30 and July 1 to December 31. 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

25. 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

26. 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

27. 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)]