STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

February 13, 2012

Ron Wagstaff
Unit Director
J.R. Simplot Company
P.O. Box 1059
Caldwell, ID 83606

RE: Facility ID No. 027-00009, J.R. Simplot Company, Caldwell
Final Tier I Operating Permit Letter

Dear Mr. Wagstaff:

The Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. T1-2011.0117 to J.R. Simplot Company at Caldwell in accordance with IDAPA 58.01.01.300 through 386, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units. This permit replaces Tier I Operating Permit No. T1-2009.0119, issued January 17, 2007 and amended on February 4, 2011. The enclosed operating permit is based on the information contained in your permit application received on July 12, 2011. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the Rules.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with J.R. Fuentes, Area Source Specialist, at 208-373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Kelli Wetzel at 208 373-0502 or kelli.wetzel@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/KW Permit No. T1-2011.0117 PROJ 60897

Enclosure

Printed on Recycled Paper

Air Quality
TIER I OPERATING PERMIT

State of Idaho
Department of Environmental Quality

PERMIT No.: T1-2011.0117
FACILITY ID No.: 027-00009
AQCR: 64 **CLASS:** A **UTM ZONE:** 11
SIC: 2037 **NAICS:** 311411
UTM COORDINATE (km): 521.5, 4835.0

1. **PERMITTEE** J. R. Simplot Company, Food Group			
2. **PROJECT** Project No. 60897 Tier I Operating Permit Renewal			
3. **MAILING ADDRESS** P.O. Box 1059	**CITY** Caldwell	**STATE** ID	**ZIP** 83606
4. **FACILITY CONTACT** Lance Carter	**TITLE** Environmental Manager	**TELEPHONE** (208) 454-4360	
5. **RESPONSIBLE OFFICIAL** Ron Wagstaff	**TITLE** Unit Director	**TELEPHONE** (208) 454-4201	
6. **EXACT PLANT LOCATION** Two Miles West of Caldwell on Highway 19		**COUNTY** Canyon	
7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS** Potato Processing			

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.

Kelli Wetzel

KELLI WETZEL, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

Mike Simon

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:	February 13, 2012
DATE MODIFIED/AMENDED:	
DATE EXPIRES:	February 13, 2017

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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
CI	compression ignition
CO	carbon monoxide
COD	chemical oxygen demand
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
ESP	electrostatic precipitator
gpm	gallons per minute
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per year
IC	internal combustion
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
RICE	reciprocating internal combustion engine
scf	standard cubic feet
SI	spark ignition
SIC	Standard Industrial Classification

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
$\mu g/m^3$	micrograms per cubic meter
WESP	wet electrostatic precipitator

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 I operating permit and update source applicability to new regulations.

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

- Permit to Construct No. P-2007.0073, issued September 6, 2007
- Permit to Construct No. P-2009.0136, issued January 29, 2010

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

- Tier I Operating Permit No. T1-2009.0119, issued February 4, 2011.

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 Description	Emissions Control
3	Production Lines No. 1, 5, and 6	Wet ESP
4	Steam Generating Plant	None
5	Heater S-C-H5	None
6	Biogas Unit	Flare
7	Emergency IC Engines	None

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 Requirement References	Monitoring and Recordkeeping Requirements
2.1	Fugitive dust	Reasonable control and no more than three minutes in any 60-minute period leaving the property boundary of the permitted facility	IDAPA 58.01.01.650-651, PTC No. 027-00009	2.2, 2.3, 2.4, 2.11, 2.12
2.5	Odors	No emissions of odorous gas, liquids, or solids	IDAPA 58.01.01.775-776	2.6, 2.11, 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, 2.11, 2.12
2.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.9.1-2.9.5, 2.11, 2.12
2.13	Fuel- burning equipment	Compliance with IDAPA 58.01.01.676-677	IDAPA 58.01.01.676-677	2.13, 2.11
2.14	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	2.14, 2.11
2.15	Open burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600-623	2.15, 2.11
2.16	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.16, 2.11
2.17	Chemical accident prevention	Compliance with 40 CFR 68	40 CFR 68	2.17, 2.11

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 quarterly 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.

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

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

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

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 readings 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.

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

- 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.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
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
Phone: (208) 373-0550 Fax: (208) 373-0287

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

Monitoring and Recordkeeping

2.11 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

2.12 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
Boise Regional Office
1445 N. Orchard
Boise, ID 83706-2239
Phone: (208) 373-0550 Fax: (208) 373-0287

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]

Fuel-Burning Equipment

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

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

Sulfur Content

2.14 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]

2.14.1 The permittee shall not sell, distribute, use, or make available for use, any coal containing greater than 1.0% sulfur by weight.

[IDAPA 58.01.01.729, 5/1/94]

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

[IDAPA 58.01.01.322.06, 5/1/94]

Open Burning

2.15 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

2.16 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

2.17 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

2.18 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

2.19 **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	• All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart GG shall be submitted to: Boise Regional Office Department of Environmental Quality 1445 N. Orchard Boise, ID 83706
60.7(a),(b), and (f)	Notification and Recordkeeping	• 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	• 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	• 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	• 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	• 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	• 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]

2.20 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	• All requests, reports, applications, submittals, and other communications associated with 40 CFR 63, Subpart(s) shall be submitted to: **Director Air and Waste** US EPA 1200 Sixth Avenue Seattle, WA 98101 **and** **Boise Regional Office** Department of Environmental Quality 1445 N. Orchard Boise, ID 83706
63.4(a)	Prohibited Activities	• 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	• 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	• 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)	• 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 and Maintenance Requirements (Opacity)	• 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). • 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	Performance Testing Requirements	• 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): 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	Notification Requirements	• 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:

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):

  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):

  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.

  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).

- 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:

  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	• 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); 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 events); Each period during which a CMS is malfunctioning or inoperative (including out-of-control periods); 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); All results of performance tests, CMS performance evaluations, and opacity and visible emission observations; All measurements as may be necessary to determine the conditions of performance tests and performance evaluations; All CMS calibration checks; All adjustments and maintenance performed on CMS; 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 All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9. • 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).

[40 CFR 63, Subpart A]

Incorporation of Federal Requirements by Reference

2.21 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. PRODUCTION LINES NO. 1, 5, AND 6

Summary Description

The following is a narrative description of the No. 1, 5, and 6 production lines regulated in this Tier I operating permit. This description is for informational purposes only. The Line No. 1 fryer was initially permitted as the Line No. 5 fryer in PTC No. 027-00009, dated December 31, 1997, and will be referred to as Line No. 1 throughout this operating permit unless otherwise noted. The Line No. 4 production line had a permit change with PTC No. P-2007.0073 which changed the production line from French fry to pre-formed potato products. The PTC also deleted the Line No. 4 dryer. Line No. 4 in previous permits will now be designated Line No. 5 at the facility's request.

The plant has three processing lines (No. 1, 5, and 6) located in Plant 2, each equipped with a blancher and a fryer, with only Lines No. 1 and 6 having a dryer. The Line No. 1 dryer and fryer were installed in 1995 and 1998, respectively; Line No. 5 fryer was installed in 2007; and Line No. 6 dryer and fryer were installed in 1968 and 1970, respectively. The rated capacities of the Line No. 1and 6 dryers are 5.5 and 28 MMBtu/hr, respectively. The rated capacities of the Line No. 1, 5, and 6 fryers are 75,000; 68,800; and 270,000 pounds per eight-hour shift. Each dryer is typically one large unit that is vented directly to the atmosphere. The fryers are primarily vented to a wet electrostatic precipitator.

Table 3.1 lists the unit numbers associated with each unit.

Table 3.1 EMISSIONS UNIT IDENTIFICATION NUMBERS

Production Line No. 1		Production Line No. 5	Production Line No. 6	
Dryer	Fryer	Fryer	Dryer	Fryer
S-C-D1	S-C-F1	S-C-F5	S-C-D6	S-C-F6

Table 3.22 describes the devices used to control emissions from production line fryers 1, 5, and 6.

Table 3.2 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Production Line No. 1 Fryer	Wet ESP
Production Line No. 5 Fryer	Wet ESP
Production Line No. 6 Fryer	Wet ESP

Table 3.33 contains only a summary of the requirements that apply to the No. 1, 5, and 6 production lines. Specific permit requirements are listed below Table 3.3.

Table 3.3 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
3.1, 3.2	PM	Process weight	IDAPA 58.01.01.701-702	None required
3.3	PM (line No. 1)	10.88 lb/hr and 47.65 T/yr	PTC Condition	3.6, 3.7, 3.8, 3.10
3.4	Visible emissions (line No. 1)	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625, PTC Condition	3.6, 3.7, 3.8, 3.10
3.5	Throughput (line No. 1)	41,908 T/yr in any consecutive 12-month period	PTC Condition	3.9

Permit Limits/Standard Summary

3.1 None of the Line No. 5 and Line No. 6 dryers or fryers shall emit to the atmosphere PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour (lb/hr), and PW is the process weight in pounds per hour:

a. If PW is less than 17,000 lb/hr,

$E = 0.045(PW)0.60$

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]

3.2 The Line No. 1 dryer or fryer shall not emit to the atmosphere PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

a. If PW is less than 9,250 lb/hr,

$E = 0.045(PW)0.60$

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

$E = 1.10(PW)0.25$

[IDAPA 58.01.01.701, 4/5/00]

3.3 The PM emissions from the line No. 1 fryer stack shall not exceed 10.88 lb/hr or 47.65 T/yr.

[PTC No. P-050016, 12/22/05]

3.4 For line No. 1 fryer, the permittee shall comply with Permit Condition 2.7.

[PTC No. P-050016, 12/22/05]

3.5 The maximum throughput of preformed potato product to the Line No. 1 fryer shall not exceed 41,908 T/yr, measured as finished product, in any consecutive 12-month period.

[PTC No. P-050016, 12/22/05]

3.6 The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications and recommendations, equipment to monitor the secondary voltage of the WESP and the quench water flow rate.

[PTC No. P-050016, 12/22/05]

3.7 The permittee shall have developed an O&M manual for the WESP that describes the procedures that will be followed to comply with the requirements for the WESP as contained in this permit, and assures that the permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution. The O&M manual shall contain, at a minimum, the following information: a general discussion of the operation of the WESP, operating procedures, normal operating ranges for the secondary voltage and the quench water flow rate, corrective action steps for when operation is not consistent with normal operating ranges, cleanup and

maintenance procedures, and recordkeeping. The O&M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

The permittee shall operate the WESP system in accordance with the O&M manual.

[PTC No. P-050016, 12/22/05]

3.8 The Line No. 1 and 6 dryers shall be fired by natural gas exclusively.

[IDAPA 58.01.01.322.01, 3/19/99]

Monitoring and Recordkeeping Requirements

3.9 The permittee shall monitor and record the throughput to the Line 1 fryer monthly and annually to demonstrate compliance Permit Condition 3.5. Annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-month period. Records of this information shall be kept on site for the most recent five year period and shall be made available to DEQ representatives upon request.

[PTC No. P-050016, 12/22/05]

3.10 The permittee shall monitor and record the following operating parameters once per day while the WESP is operating. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request:

- The secondary voltage of the WESP
- The flow rate of the quench water system
- The quench water system shall be monitored and a daily record kept of whether the sprays are in operation and the corrective action taken when the sprays are not in operation

[PTC No. P-050016, 12/22/05]

4. STEAM GENERATING PLANT

Summary Description

The following is a narrative description of the steam generating plant regulated in this Tier I operating permit. This description is for informational purposes only.

The steam generating plant consists of two natural gas-fired boilers that supply steam to the potato processing plant and the ethanol plant. Boiler No. 8 (The Kewanee boiler) is a natural gas fired boiler installed in 1966 and has a rated capacity of 80.8 MMBtu/hr. There is currently no control device on this boiler. Boiler No. 1 (English & Tube boiler) is a natural gas and biogas fired boiler installed in 2008 and has a rated capacity of 98.25 MMBtu/hr. This boiler is equipped with a flue gas recirculation system.

Table 4.1 describes the devices used to control emissions from the steam generating plant.

Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Boiler No. 8	None
Boiler No. 1	Flue Gas Recirculation

Table 4.2 contains only a summary of the requirements that apply to the steam generating plant. 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% oxygen	IDAPA 58.01.01.677	4.2
4.2	Boiler No. 8 Fuel type	Natural gas only	IDAPA 58.01.01.322.01; PTC condition	2.11
4.3	Boiler No. 1 Fuel type	Natural gas or a mixture of natural gas and biogas	IDAPA 58.01.01.322.01; PTC condition	4.4, 4.5, 4.6
4.4	Boiler No. 1 operation	Boiler No. 1 shall be operated with a flue gas recirculation system	PTC condition	4.5, 4.6

Permit Limits/Standard Summary

4.1 The permittee shall not discharge to the atmosphere from any fuel burning equipment in operation prior to October 1, 1979, PM in excess of 0.015 gr/dscf corrected to 3% oxygen.

[IDAPA 58.01.01.677, 5/1/94]

4.2 Boiler No. 8 shall be fired by natural gas exclusively.

[PTC No. P-060025, 6/14/06]

4.3 Boiler No. 1 shall be fired on natural gas or a mixture of natural gas and biogas.

[PTC No. P-2009.0136, 1/29/10]

Operating Requirements

4.4 Boiler No. 1 shall be equipped with a flue gas recirculation system. The flue gas recirculation system shall be operational at all times that the boiler is operating.

[PTC No. P-2009.0136, 1/29/10]

Monitoring and Recordkeeping Requirements

4.5 The permittee shall monitor and maintain records of the amount of natural gas and biogas combusted in Boiler No. 1 each day in accordance with 40 CFR 60.48c(g)(1), or the permittee may elect to record and maintain records of the amount of fuel combusted during each calendar month in accordance with 40 CFR 60.48c(g)(2); or to record and maintain records of the total amount of gas delivered to that property during each calendar month in accordance with 40 CFR 60.48c(g)(3).

[PTC No. P-2009.0136, 1/29/10]

Reporting Requirements

4.6 For Boiler No. 1, the permittee shall comply with all applicable notification requirements of 40 CFR 60.48c(a) and 40 CFR 60.7, including:

- Notification of the date of construction and the heat input capacity of the affected units, no later than 30 days after such date.
- Notification of the actual date of initial startup
- Notification of any physical and operational changes which may increase emissions, unless that change is specifically exempted by 40 CFR Subpart Dc or by 40 CFR 60.14(e). The notification shall be postmarked 60 days before the change is made, or as soon as reasonably practicable. The notification shall include: the precise nature of the change, present and proposed emission control systems, productive capacity before and after the change, and the expected completion date of the change.

Notifications should be submitted the following address:

Department of Environmental Quality
Boise Regional Office
Attn: Air – NSPS Reporting
1445 N. Orchard
Boise, ID 83706

Phone: (208) 373-0550
Fax: (208) 373-0287

[PTC No. P-2009.0136, 1/29/10]

5. HEATER S-C-H5

Summary Description

There is one natural gas-fired heating unit (S-C-H5) used to heat the plant that does not qualify as an insignificant activity. This heater has a rated capacity of 10.1 MMBtu/hr and was installed on January 15, 1991. Emissions from the heaters are released to the atmosphere through room vents. Combustion emissions for the heaters are based on continuous operation at burner capacity, assuming all emissions are released to the atmosphere.

Table 5. contains only a summary of the requirements that apply to the heater. Specific permit requirements are listed below Table 5..

Table 5.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
5.1	PM	0.015 gr/dscf at 3% O_2	IDAPA 58.01.01.676	5.2
5.2	Fuel type	Natural gas only	IDAPA 58.01.01.322.01	2.11

Permit Limits/Standard Summary

5.1 The permittee shall not discharge to the atmosphere from any fuel-burning equipment in operation on or after October 1, 1979, with a maximum rated input equal to or exceeding 10 MMBtu/hr, PM in excess of 0.015 gr/dscf corrected to 3% oxygen.

[IDAPA 58.01.01.676, 5/1/94]

5.2 The heater shall be fired by natural gas exclusively.

[IDAPA 58.01.01.322.01, 3/19/99]

6. BIOGAS UNIT

Summary Description

Gases produced by the ADI-BVF anaerobic digester at the wastewater treatment facility are referred to as biogases. The biogas primarily consists of methane, carbon dioxide, and hydrogen sulfide (H_2S). These gases are collected and routed to a waste flare (Unit No. S-C-BF) equipped with a natural gas-fired pilot light. The flare combusts the biogas to form carbon dioxide, sulfur dioxide, and water, which are vented to the atmosphere. The biogas can also be burned in Boiler No. 1. The ADI-BVF anaerobic digester and biogas flare were initially permitted for construction in PTC No. 027-00009, dated December 17, 1997. The PTC has since been amended, revised, and incorporated into PTC No. P-2009.0136.

Table 6.1 contains only a summary of the requirements that apply to the Biogas Unit. Specific permit requirements are listed below Table 6..

Table 6.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
6.1	SO_2	Not to exceed 90.0 T/yr	PTC Condition	
6.2	H_2S	Not to exceed 5391 ppmv	PTC Condition	
6.3	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; PTC Condition	
6.4	COD	COD reduction in the digester shall not exceed 2,000,000 lb/mo	PTC Condition	
6.5	Flare operation	Flare shall be operated with pilot flame	PTC Condition	

Permit Limits/Standard Summary

6.1 The total SO_2 emissions from the combustion of biogas from the ADI-BVF digester flare stack and Boiler No. 1 shall not exceed 90.0 tons per any consecutive 12-month period.

[PTC No. P-2009.0136, 1/29/10]

6.2 The H_2S concentration in the biogas shall not exceed a maximum of 5391 parts per million by volume (ppmv).

[PTC No. P-2009.0136, 1/29/10]

6.3 The permittee shall comply with Permit Condition 2.7.

[PTC No. P-2009.0136, 1/29/10]

6.4 The COD reduction of the wastewater in the ADI-BVF digester shall be limited to an average of 2,000,000 pounds per month during any 12-month period. This permit limit shall expire upon initiation of the monitoring of the biogas flow rate to the flare and Boiler No. 1. Once the biogas flow rate is monitored, the biogas flow rate shall be limited to an average of 10,000,000 scf of methane per month during any 12-month period.

[PTC No. P-2009.0136, 1/29/10]

Operating Requirements

6.5 The ADI-BVF anaerobic digester flare shall be operated with a pilot flame present at all times during the operation of the digester.

[PTC No. P-2009.0136, 1/29/10]

6.6 The permittee shall maintain an O&M manual for the ADI-BVF digester flare that describes the procedures that will be followed to comply with the general provision regarding maintenance and efficient operation of the control equipment and the manufacturer specifications for the air pollution control device. This manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-2009.0136, 1/29/10]

Monitoring and Recordkeeping Requirements

6.7 The permittee shall install, calibrate, maintain, and operate a biogas flowmeter to measure the biogas being burned at the flare and Boiler No. 1 from the anaerobic digester. The biogas flowrate shall be monitored continuously and an accumulated amount recorded once per month. The actual cubic feet per minute (acfm) flow values measured shall be converted to standard cubic feet per minute (scfm) to compare to the biogas flowrate limit. The biogas shall be tested for methane once per week, in accordance with 40 CFR 98.350, Subpart II, and the weekly readings shall be averaged and recorded once per month.

[PTC No. P-2009.0136, 1/29/10]

6.8 The COD reduced in the ADI-BVF digester shall be monitored and recorded, at a minimum, on a monthly basis. Monthly values shall be used to calculate 12-month averages. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representative upon request. This permit limit shall expire upon initiation of the monitoring of the biogas flow rate to the flare and Boiler No. 1.

[PTC No. P-2009.0136, 1/29/10]

6.9 The permittee shall calibrate, maintain, and operate, in accordance with manufacturer specifications, a thermocouple or other equivalent device which detects the presence of the flame. When a pilot flame is not present, the following information shall be recorded in a log: 1) the date(s) that the flame was not present, 2) the duration time the flame was not present, and 3) the reason the flame was not present. A compilation of the most recent two years of records shall be kept on site and shall be made available to DEQ representatives upon request.

[PTC No. P-2009.0136, 1/29/10]

6.10 The permittee shall comply with Permit Condition 2.8.

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

Reporting Requirements

6.11 Beginning on March 1, 2012, the permittee shall submit a summary compliance report to DEQ every six months for the monitoring required in Permit Conditions 6.8, 6.9, and 6.10. The report is to be received no later than 30 days after the end of each six-month period, and shall clearly identify any deviations from the conditions specified in this permit.

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

6.12 All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[PTC No. P-2009.0136, 1/29/10]

7. EMERGENCY IC ENGINES

Summary Description

Table 6.1 describes the devices used to control emissions from four emergency IC engines identified as Units 1-4.

Table 6.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Unit 1: 166 hp diesel CI engine installed prior to June 12, 2006	None
Unit 2: 287 hp diesel CI engine installed prior to June 12, 2006	None
Unit 3: 14.8 hp natural gas SI engine installed after June 12, 2006	None
Unit 4: 55 hp natural gas SI engine installed prior to June 12, 2006	None

The permittee shall comply will all applicable requirements of 40 CFR 63, Subpart ZZZZ and all applicable general provisions of 40 CFR 63 Subpart A. The permittee shall also comply with all applicable requirements of 40 CFR 60, Subpart JJJJ and all applicable general provisions of 40 CFR 60 Subpart A.

Subpart ZZZZ applies to the existing Reciprocating Internal Combustion Engines (RICE), Units 1, 2, and 4, located at an area source of HAP emissions. Subpart JJJJ applies to the stationary SI ICE, Unit 3, which was manufactured on or after July 1, 2008.

Compliance Date

7.1 In accordance with 40 CFR 63.6595(a)(1), Units 1 and 2 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)]

7.2 In accordance with 40 CFR 63.6595(a)(1), Unit 4 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 October 19, 2013.

[40 CFR 63.6595(a)(1)]

Permit Limits/Standard Summary

7.3 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 stationary emergency CI RICE, Units 1 and 2. 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)]

7.4 In accordance with 40 CFR 63.6603(a), on and after October 19, 2013, the following emission limits or operating restrictions are required for the stationary emergency SI RICE, Unit 4. 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 spark plugs 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)]

7.5 In accordance with 40 CFR 60.4233(a), the permittee must comply with the emission standards in 40 CFR 42.31(a) for a stationary SI ICE with a maximum engine power less than or equal to 19 KW (25 hp), Unit 3.

In accordance with 40 CFR 60.4231(a), the permittee must certify Unit 3 to certification emissions standards and other requirements for new nonroad SI engines in 40 CFR part 90 or 1054.

[40 CFR 60.4233(a), 40 CFR 60.4231(a)]

Operating Requirements

7.6 In accordance with 40 CFR 63.6605, the permittee shall, at all times, operate and maintain the Units 1, 2 and 4, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.6605]

7.7 In accordance with 40 CFR 60.4234, the permittee shall operate and maintain Unit 3 so that it achieves the emission standards as required in 40 CFR 60.4233 over the entire life of the engine.

[40 CFR 60.4234]

7.8 In accordance with 40 CFR 60.4244, owners or operators of stationary SI ICE who conduct performance tests must follow the procedures in paragraphs (a) through (f) of this permit condition.

(a) Each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and according to the requirements in 40 CFR 60.8 and under the specific conditions that are specified in Table 7.2.

Table 6.2 REQUIREMENTS FOR PERFORMANCE TESTS

For each	Complying with the requirement to	You must	Using	According to the following requirements
1. Stationary SI internal combustion engine demonstrating compliance according to §60.4244.	a. limit the concentration of NOXin the stationary SI internal combustion engine exhaust.	i. Select the sampling port location and the number of traverse points;	(1) Method 1 or 1A of 40 CFR part 60, appendix A or ASTM Method D6522–00(2005)a.	(a) If using a control device, the sampling site must be located at the outlet of the control device.
	ii. Determine the O2concentration of the stationary internal combustion engine exhaust at the sampling port location;	(2) Method 3, 3A, or 3B[b] of 40 CFR part 60, appendix A or ASTM Method D6522–00(2005)[a].	(b) Measurements to determine O_2concentration must be made at the same time as the measurements for NO_Xconcentration.	

	iii. Determine the exhaust flowrate of the stationary internal combustion engine exhaust;	(3) Method 2 or 19 of 40 CFR part 60.		
	iv. If necessary, measure moisture content of the stationary internal combustion engine exhaust at the sampling port location; and	(4) Method 4 of 40 CFR part 60, appendix A, Method 320 of 40 CFR part 63, appendix A, or ASTM D6348–03 (incorporated by reference, see §60.17).	(c) Measurements to determine moisture must be made at the same time as the measurement for NO_X concentration.	
	v. Measure NO_X at the exhaust of the stationary internal combustion engine.	(5) Method 7E of 40 CFR part 60, appendix A, Method D6522–00(2005)[a], Method 320 of 40 CFR part 63, appendix A, or ASTM D6348–03 (incorporated by reference, see §60.17).	(d) Results of this test consist of the average of the three 1-hour or longer runs.	
	b. limit the concentration of CO in the stationary SI internal combustion engine exhaust.	i. Select the sampling port location and the number of traverse points;	(1) Method 1 or 1A of 40 CFR part 60, appendix A.	(a) If using a control device, the sampling site must be located at the outlet of the control device.
	ii. Determine the O_2 concentration of the stationary internal combustion engine exhaust at the sampling port location;	(2) Method 3, 3A, or 3Bb of 40 CFR part 60, appendix A or ASTM Method D6522–00(2005)[a].	(b) Measurements to determine O_2 concentration must be made at the same time as the measurements for CO concentration.	
	iii. Determine the exhaust flowrate of the stationary internal combustion engine exhaust;	(3) Method 2 or 19 of 40 CFR part 60.		
	iv. If necessary, measure moisture content of the stationary internal combustion engine exhaust at the sampling port location; and	(4) Method 4 of 40 CFR part 60, appendix A, Method 320 of 40 CFR part 63, appendix A, or ASTM D6348–03 (incorporated by reference, see §60.17).	(c) Measurements to determine moisture must be made at the same time as the measurement for CO concentration.	
	v. Measure CO at the exhaust of the stationary internal combustion engine.	(5) Method 10 of 40 CFR part 60, appendix A, ASTM Method D6522–00(2005)[a], Method 320 of 40 CFR part 63, appendix A, or ASTM D 6348–03 (incorporated by reference, see §60.17).	(d) Results of this test consist of the average of the three 1-hour or longer runs.	
	c. limit the concentration of VOC in the stationary SI internal combustion engine exhaust.	i. Select the sampling port location and the number of traverse points;	(1) Method 1 or 1A of 40 CFR part 60, appendix A.	(a) If using a control device, the sampling site must be located at the outlet of the control device.
	ii. Determine the O_2 concentration of the stationary internal combustion engine exhaust at the sampling port location;	(2) Method 3, 3A, or 3B[b] of 40 CFR part 60, appendix A or ASTM Method D6522–00(2005)[a].	(b) Measurements to determine O_2 concentration must be made at the same time as the measurements for VOC concentration.	
	iii. Determine the exhaust flowrate of the stationary internal combustion engine exhaust;	(3) Method 2 or 19 of 40 CFR part 60.		

	iv. If necessary, measure moisture content of the stationary internal combustion engine exhaust at the sampling port location; and	(4) Method 4 of 40 CFR part 60, appendix A, Method 320 of 40 CFR part 63, appendix A, or ASTM D6348–03 (incorporated by reference, see §60.17).	(c) Measurements to determine moisture must be made at the same time as the measurement for VOC concentration.	
	v. Measure VOC at the exhaust of the stationary internal combustion engine.	(5) Methods 25A and 18 of 40 CFR part 60, appendix A, Method 25A with the use of a methane cutter as described in 40 CFR 1065.265, Method 18 or 40 CFR part 60, appendix A,[cd]Method 320 of 40 CFR part 63, appendix A, or ASTM D6348–03 (incorporated by reference, see §60.17).	(d) Results of this test consist of the average of the three 1-hour or longer runs.	

[a]ASTM D6522–00 is incorporated by reference; see 40 CFR 60.17. Also, you may petition the Administrator for approval to use alternative methods for portable analyzer.
[b]You may use ASME PTC 19.10–1981, Flue and Exhaust Gas Analyses, for measuring the O_2content of the exhaust gas as an alternative to EPA Method 3B.
[c]You may use EPA Method 18 of 40 CFR part 60, appendix A, provided that you conduct an adequate presurvey test prior to the emissions test, such as the one described in OTM 11 on EPA's Web site (http://www.epa.gov/ttn/emc/prelim/otm11.pdf).
[d]You may use ASTM D6420–99 (2004), Test Method for Determination of Gaseous Organic Compounds by Direct Interface Gas Chromatography/Mass Spectrometry as an alternative to EPA Method 18 for measuring total nonmethane organic.

(b) The permittee may not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in 40 CFR 60.8(c). If Unit 3 is non-operational, the permittee does not need to startup the engine solely to conduct a performance test; however, the performance test needs to be conducted immediately upon startup of the engine.

(c) The permittee must conduct three separate runs for each performance test required, as specified in 40 CFR 60.8(f). Each test run must be conducted within 10 percent of 100 percent peak (or the highest achievable) load and last at least 1 hour.

(d) To determine compliance with the NO_x mass per unit output emission limitation, convert the concentration of NO_x in the engine exhaust using Equation 1.

$$ER = (C_d \times 1.912 \times 10^{-3} \times Q \times T)/HP\text{-}hr \quad (Eq.\ 1)$$

Where:

ER = Emission rate of NO_X in g/HP-hr.

C_d= Measured NO_x concentration in parts per million by volume (ppmv).

1.912×10−3 = Conversion constant for ppm NO_x to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meter per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, horsepower-hour (HP-hr).

(e) To determine compliance with the CO mass per unit ouput emission limitation, convert the concentration of CO in the engine exhaust using Equation 2.

$$ER = (C_d \times 1.164 \times 10^{-3} \times Q \times T)/HP\text{-}hr \quad (Eq.\ 2)$$

Where:

ER = Emission rate of CO in g/HP-hr.

C_d= Measured CO concentration in ppmv.

1.164×10−3 = Conversion constant for ppm CO to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, horsepower-hour (HP-hr).

(f) For purposes of Subpart JJJJ, when calculating emissions of VOC, emissions of formaldehyde should not be included. To determine compliance with the VOC mass per unit output emission limitation, convert the concentration of VOC in the engine exhaust using Equation 3.

$$ER = (C_d \times 1.833 \times 10^{-3} \times Q \times T)/HP\text{-}hr \quad (Eq.\ 3)$$

Where:

ER = Emission rate of VOC in g/HP-hr.

Cd= VOC concentration measured as propane in ppmv.

1.833×10−3 = Conversion constant for ppm VOC measured as propane, to grams per standard cubic meter at 20 degrees Celsius.

Q = Stack gas volumetric flow rate, in standard cubic meters per hour, dry basis.

T = Time of test run, in hours.

HP-hr = Brake work of the engine, horsepower-hour (HP-hr).

(g) If the permittee chooses to measure VOC emissions using either Method 18 of 40 CFR part 60, appendix A, or Method 320 of 40 CFR part 63, appendix A, then it has the option of correcting the measured VOC emissions to account for the potential differences in measured values between these methods and Method 25A. The results from Method 18 and Method 320 can be corrected for response factor differences using Equations 4 and 5. The corrected VOC concentration can then be placed on a propane basis using Equation 6.

$$RF_i = C_{Mi}/C_{Ai} \quad (Eq.\ 4)$$

Where:

RF_i= Response factor of compound i when measured with EPA Method 25A.

C_{Mi}= Measured concentration of compound i in ppmv as carbon.

C_{Ai}= True concentration of compound i in ppmv as carbon.

$$C_{icorr} = RF_i \times C_{imeas} \quad (Eq.\ 5)$$

Where:

C_{icorr} = Concentration of compound i corrected to the value that would have been measured by EPA Method 25A, ppmv as carbon.

RF_i= Response factor of compound i when measured with EPA Method 25A.

C_{imeas} = Concentration of compound i measured by EPA Method 320, ppmv as carbon.

$$C_{Peq} = 0.6098 \times C_{icorr} \quad \text{(Eq. 6)}$$

Where:

C_{Peq}= Concentration of compound i in mg of propane equivalent per DSCM.

C_{icorr} = Concentration of compound i corrected to the value that would have been measured by EPA Method 25A, ppmv as carbon.

[40 CFR 60.4244]

Monitoring and Recordkeeping Requirements

7.9 In accordance with 40 CFR 63.6625(e)(3), the permittee must operate and maintain Units 1, 2, and 4, and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a 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)]

7.10 In accordance with 40 CFR 60.4243(a), the permittee must demonstrate compliance by purchasing an engine certified to the emission standards in 40 CFR 60.4231(a) through (c), as applicable, for the same engine class and maximum engine power. In addition, the permittee must meet one of the requirements specified as follows:

- If the permittee operates and maintains Unit 3 according to the manufacturer's emission-related written instructions, the permittee must keep records of conducted maintenance to demonstrate compliance, but no performance testing is required. The permittee must also meet the requirements as specified in 40 CFR 1068, subparts A through D, as they apply.
- If the permittee does not operate and maintain Unit 3 according to the manufacturer's emission-related written instructions, Unit 3 will be considered a non-certified engine, and the permittee must demonstrate compliance. The permittee must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate Unit 3 in a manner consistent with good air pollution control practice for minimizing emissions, but no performance testing is required.

[40 CFR 60.4243(a)]

7.11 In accordance with 63.6625(f), Units 1, 2, and 4, which are 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)]

7.12 In accordance with 40 CFR 60.4237(c), the permittee must install a non-resettable hour meter upon startup of the emergency engine, Unit 3.

[40 CFR 60.4237(c)]

7.13 In accordance with 40 CFR 63.6625(h), Units 1, 2, and 4, 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 applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to 40 CFR 63 Subpart ZZZZ apply.

[40 CFR 63.6625(h)]

7.14 In accordance with 40 CFR 63.6625(j), the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in the Permit Limits/Standard Summary permit condition for Units 1 and 2. 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 condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the stationary emergency RICE owner or operator is not required to change the oil. If any of the limits are exceeded, the stationary emergency RICE owner or operator must change the oil within 2 days of receiving the results of the analysis; if the stationary emergency RICE is not in operation when the results of the analysis are received, the stationary emergency RICE owner or operator must change the oil within 2 days or before commencing operation, whichever is later. 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 stationary emergency RICE. The analysis program must be part of the maintenance plan for the stationary emergency RICE.

[40 CFR 63.6625(i)]

7.15 In accordance with 40 CFR 63.6625(j), the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in the Permit Limits/Standard Summary permit condition for Unit 4. 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 Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the stationary emergency RICE owner or operator is not required to change the oil. If any of the limits are exceeded, the stationary emergency RICE owner or operator must change the oil within 2 days of receiving the results of the analysis; if the stationary emergency RICE is not in operation when the results of the analysis are received, the stationary emergency RICE owner or operator must change the oil within 2 days or before commencing operation, whichever is later. 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 stationary emergency RICE. The analysis program must be part of the maintenance plan for the stationary emergency RICE.

[40 CFR 63.6625(j)]

7.16 In accordance with 40 CFR 63.6640(f), the permittee must operate Units 1, 2, and 4 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 stationary 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 stationary emergency RICE. 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)]

7.17 In accordance with CFR 60.4243(d), the permittee may operate Unit 3 for the purpose of maintenance checks and readiness testing, provided that 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 is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations. Unit 3 may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing.

[40 CFR 60.4243(d)]

7.18 In accordance with 40 CFR 63.6655(e), the permittee must keep records of the maintenance conducted on Units 1, 2, and 4 in order to demonstrate that the permittee operated and maintained Units 1, 2, and 4 and after-treatment control device (if any) according to the maintenance plan if the permittee owns or operates 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, the permittee must keep records of the hours of operation of the stationary emergency RICE 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 stationary emergency RICE 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,f), 63.6660]

7.19 In accordance with 40 CFR 60.4245(a), the permittee must keep records of the following information for Unit 3.

(1) All notifications submitted to comply with this Subpart JJJJ and all documentation supporting any notification.

(2) Maintenance conducted on the engine.

(3) If Unit 3 is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable.

(4) If Unit 3 is not a certified engine or is a certified engine operating in a non-certified manner and subject to 40 CFR 40.4243(a)(2), documentation that the engine meets the emission standards.

[40 CFR 60.4245(a)]

7.20 In accordance with 40 CFR 60.4245(d), the permittee must submit a copy of each performance test as conducted in 40 CFR 60.4244 with 60 days after the test has been completed for Unit 3.

[40 CFR 60.4245(d)]

7.21 Any notifications or reporting required by 40 CFR 60 JJJJ or Subpart A – General Provision, and 40 CFR 63, Subpart ZZZZ or Subpart A – General Provisions shall be submitted to the following addresses:

Air Quality Permit Compliance
Boise Regional Office
Department of Environmental Quality
1445 N. Orchard
Boise, ID 83706
Phone: (208) 373-0550
Fax: (208) 373-0287

and

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

[40 CFR 60 Subpart JJJJ, 40 CFR 63 Subpart ZZZZ]

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
Storage tanks and vessels with less than 260 gallon capacity with appropriate closures	IDAPA 58.01.01.317.01(b)(i)(1)
Storage tanks and vessels with less than 1,100 gallon capacity with appropriate closures, not for use with HAPs ,and with a maximum vapor pressure of 550 mmHg	IDAPA 58.01.01.317.01(b)(i)(2)
Unleaded gasoline storage tank and off-specification ethanol storage tank	IDAPA 58.01.01.317.01(b)(i)(3)
Propane storage tank	IDAPA 58.01.01.317.01(b)(i)(4)
Various natural gas-fired air makeup units rated less than 5 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(5)
Various combustion sources rated less than 5 MMBtu/hr, containing less than 0.4% by weight sulfur for coal or less than 1% by weight for other fuels	IDAPA 58.01.01.317.01(b)(i)(6)
Diesel-fired emergency generators rated less than 1 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(7)
Welding using less than 1 T/day	IDAPA 58.01.01.317.01(b)(i)(9)
Ink used to print on packaging using less than 2 gallons per day	IDAPA 58.01.01.317.01(b)(i)(12)
Various water-cooling towers that are non-process-contact coolers and not greater than 10,000 gallons per minute	IDAPA 58.01.01.317.01(b)(i)(13)
Water chlorination less than 20,000,000 gallons per day of water	IDAPA 58.01.01.317.01(b)(i)(16)
Natural gas, propane, or kerosene-fired space heaters rated less than 5 MMBtu/hr	IDAPA 58.01.01.317.01(b)(i)(18)
Tanks, vessels, and pumping equipment with appropriate closure for storage or dispensing of aqueous solutions of inorganic salts, bases and acids	IDAPA 58.01.01.317.01(b)(i)(19)
Equipment used to exclusively pump, load, and store vegetable oil	IDAPA 58.01.01.317.01(b)(i)(20)
Cleaning and stripping activities and equipment using solutions with less than 1% VOCs by weight	IDAPA 58.01.01.317.01(b)(i)(26)
Storage and handling of water-based lubricants for metal working with an organic content of less than 10%	IDAPA 58.01.01.317.01(b)(i)(27)
Heaters S-C-H4, S-C-H6, S-C-H7, S-C-H8, S-C-H9, S-C-H10, S-C-H11, and S-C-H12	IDAPA 58.01.01.317.01(b)(i)(30)

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.l, 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 March 1 to February 28 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 March 1 to September 1 and September 2 to February 28. 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)]