

Statement of Basis

Tier I Operating Permit No. T1-2012.0008

Project ID 61000

Idaho Forest Group, LLC - Riley Creek

Laclede, Idaho

Facility ID 017-00027

Draft for Public Comment

May XX, 2012

Eric Clark

Permit Writer

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

1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE3

2. INTRODUCTION AND APPLICABILITY.....4

3. FACILITY INFORMATION5

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY7

5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY8

6. EMISSIONS LIMITS AND MRRR.....10

7. REGULATORY REVIEW22

8. PUBLIC COMMENT31

9. EPA REVIEW OF PROPOSED PERMIT31

APPENDIX A - EMISSIONS INVENTORY

APPENDIX B - FACILITY COMMENTS FOR DRAFT PERMIT

1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
ESP	electrostatic precipitator
GHG	greenhouse gases
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HHV	higher heating value
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O ₂	oxygen
PC	permit condition
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration

PTC	permit to construct
PTE	potential to emit
PW	process weight rate
RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12-calendar month period
T1	Tier I operating permit
T2	Tier II operating permit
ULSD	ultra-low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compound

2. INTRODUCTION AND APPLICABILITY

Idaho Forest Group, LLC, Laclede (IFG) is a manufacturer of dimensional lumber, and is located at 30 Riley Creek Park Drive. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit carbon monoxide, particulate matter, nitrogen oxide and volatile organic compounds above the major source threshold of 100 tons-per-year. The facility is also classified as a major facility, as defined by Subsection 008.10.a, because it emits or has the potential to emit acetaldehyde above the major source thresholds of 10 tons-per-year and 25 tons-per-year for any combination of HAP.

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

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

IFG Tier I operating permit is organized into sections. They are as follows:

Section 1 - Acronyms, Units and Chemical Nomenclature

This section provides a list of acronyms, unit and other nomenclature used throughout the permit.

Section 2 - Tier I Operating Permit Scope

The scope describes this permitting action.

Section 3 - Facility-Wide Conditions

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

Sections 4 through 6 – Perry Smith ABCO wood-fired boiler #1, Kipper and Sons wood-fired boiler #2, and rail car target box and planer shavings cyclone

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

Section 7 – Miscellaneous Sources

The sources listed in this section of the Tier I operating permit are not currently subject to regulation(s) under any other DEQ-issued permits. These sources have potential PM emissions rates exceeding 10% of the significance level in IDAPA 58.01.01.317. These sources are also subject to IDAPA 58.01.01.702. Therefore, they are grouped together in this section with applicable requirements of the rules. The following sources are included in this permit as miscellaneous sources: debarker, bark hog shredder, drying kilns, sawdust bin truck loadout, and sawmill chip bin truck loadout.

Section 8 – NESHAP 40 CFR 63, Subpart ZZZZ

This section provides the applicable federal requirements for the emergency fire pump engine used periodically by IFG.

Section 9 - Compliance Assurance Monitoring

The purpose of this section of the permit is to include all of the applicable requirements of the Compliance Assurance Monitoring (CAM), 40 CFR 64.

Section 10 - Non-applicable Requirements and Insignificant Activities

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

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

Section 11 - General Provisions

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

3. FACILITY INFORMATION

3.1 Facility Description

The IFG operates a lumber mill that processes raw logs into dried lumber. The mill consists of a sawmill, drying kilns, a planer mill, and associated equipment. A steam plant consisting of two wood-fired boilers provides steam to the facility. The facility has the potential to operate 24 hours per day, seven days per week, 52 weeks per year, processing up to 318 million board feet (MMbf) annually.

Logs are delivered to the mill by truck and stored in the log decks until processed. Logs are transported by loaders to the debarking area, where bark is removed from the logs. Bark from the debarkers is shredded through a hog and then conveyed to a drop pile, where it can be transferred by a front-end loader to the boiler fuel storage bin, the hog fuel pile, or to trucks for off-site sale. Fuel from the boiler fuel storage bin

is augured to boiler No. 1 and fuel from the hog fuel pile is loaded into a hopper and conveyed to boiler No. 2.

Debarked logs enter the sawmill and are cut into lumber. Waste wood generated during edging is processed in a chipper and screened to separate fines and chips. The wood chips are pneumatically transferred to the railcar target box or conveyed to the chip truck bin for load out and sale. Sawmill fines are combined with sawmill sawdust and conveyed to a truck bin for load out.

Lumber is sorted, stacked, and then dried in steam-heated kilns. Each kiln has multiple roof vents used to control the temperature within each kiln by releasing hot air from inside the kilns.

Lumber is then transferred to the planer mill, where it is planed and trimmed. The trimmed ends are chipped and transferred pneumatically to the railcar target box. The shavings are conveyed from the cyclone to a truck bin for load out.

Finished lumber is then sorted, graded, stacked, wrapped, and stored until shipped off-site by truck or rail car.

3.2 Facility Permitting History

Tier I Operating Permit History - Previous 5-year permit term December 4, 2007 to December 4, 2012

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from December 4, 2007, to December 4, 2012. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

January 11, 2010 T1-2008.0201, Ownership name change. CAM indicator ranges were added. An increase in allowable steaming rate based on September 30, 2008 source test., Permit status (A, will be S as a result of this project).

December 4, 2007 T1-060125, renewed Tier I permit issued, Permit status (S)

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

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

January 11, 2010 T1-2008.0201, Ownership name change. CAM indicator ranges were added. An increase in allowable steaming rate based on September 30, 2008 source test., Permit status (A, will be S as a result of this project).

December 4, 2007 T1-060125, renewed Tier I permit issued. This permit was issued to Riley Creek Lumber Company. Permit status (S).

July 30, 2002 T1-9504-042-1, Administrative amendment to Tier I OP for Riley Creek Lumber Company. The DEQ-initiated administrative amendments include correction of typographical errors and insertion of an omitted applicable requirement contained in an existing PTC for the facility. Permit status (S).

May 3, 2002 Tier I OP, Permit No. 017-00027, initial Tier I OP. This permit was issued to Riley Creek Lumber Company. Permit status (S).

June 26, 2001 PTC, Permit No. 017-00027. This permit is to amend the facility's two PTCs (PTC Nos. 0240-0027 and 017-00027) to prevent outdated and no longer applicable requirements from being incorporated into their forthcoming TV operating permit. The facility also proposed to modify the PTC No. 0240-0027 by increasing the allowable carbon monoxide emissions from boiler #1. Permit status (A).

July 21, 1997 PTC Exemption for two drying kilns. PTC exemption status (A).

December 31, 1996 Initial PTC No. 017-00027, issued to Riley Creek Lumber Company for Kipper and Sons wood-fired boiler. Permit status (S).

January 13, 1989 State operating permit No. 0240-0027, issued for Riley Creek Lumber Company. The permit was for ABCO boiler and associated handling of wood waste; Olivine burner and associated wood waste; planer mill shavings Cyclones, boiler fuel bin cyclone truck bin shaving cyclone and associated shavings pneumatic; truck bin chip cyclone (cyclone #4) and associated chip pneumatic conveyance system; and plant property and fugitive emissions sources. Permit status (S).

October 19, 1988 State operating permit No. 0240-0027, issued to Riley Creek Lumber Company. The permit is for saw and planer mill and for the Olivine burner. Permit status (S).

February 28, 1985 State operating permit No. 0240-0027, issued to Riley Creek Lumber Company for a lumber mill, fugitive emissions, and wood waste boiler. Permit status (S).

March 1, 1984 State operating permit No. 0240-0027, issued to Riley Creek Lumber Company. The permit is for hog fuel boiler, fugitive emissions. Permit status (S).

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

4.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit. 40 CFR 63, Subpart ZZZZ requirements were added for the emergency fire pump that is no longer considered an insignificant activity. Also, the CAM section has been modified into a different tabular format. However, the content remains unchanged.

4.2 Application Chronology

February 15, 2012 Tier I Operating permit renewal application was received.

March 30, 2012 The application was deemed complete.

April 20, 2012 DEQ made available the draft permit and statement of basis for peer and regional office review.

April 27, 2012 DEQ made available the draft permit and statement of basis for applicant review.

May 3, 2012 DEQ made available a second draft permit and statement of basis for review.

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

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

5.1 Process No. 1 – Boiler No. 1

Table 5.1 lists the emissions units and control devices associated with Boiler No. 1.

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

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Boiler No. 1	Perry Smith ABCO – Wood-Fired Boiler	Multiclone and ESP in Series	Boiler No. 1 stack

Boiler No. 1 was originally built in 1976 and initially permitted for operation at IFG by Air Pollution Source Permit No. 0240-00027, dated March 1, 1984. Control equipment on boiler No. 1 is a multiclone and electrostatic precipitator (ESP) in series. The boiler is located in the steam plant building and operates on wood fuel exclusively. The boiler can potentially operate 24 hours per day, seven days per week, and 52 weeks per year.

In the Tier I OP application that was received by DEQ on July 27, 2006, IFG requested a determination of applicability of NSPS requirements (40 CFR 60, Subpart Dc) for boiler No. 1. DEQ has reviewed the requirements of 40 CFR 60, Subpart Dc, and determined that boiler No. 1 is not currently subject to Subpart Dc because the boiler was constructed prior to 1976, and has not been modified or reconstructed since June 9, 1989 (the trigger date for Subpart Dc)

5.2 Process No. 2 – Boiler No. 2

Table 5.2 lists the emissions units and control devices associated with Boiler No. 2.

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

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Boiler No. 2	Kipper and Sons – Wood-Fired Boiler	Multiclone and ESP in series	Boiler No. 2 stack

Boiler No. 2 was originally constructed in 1975 and permitted in 1996 (PTC No. 017-00027, dated December 31, 1996) for installation at IFG, Laclede facility. Control equipment on boiler No. 2 is a multiclone and ESP in series. The boiler is located in the steam plant building and operates on wood fuel exclusively. The boiler can potentially operate 24 hours per day, seven days per week, and 52 weeks per year.

In the Tier I OP application, that was received by DEQ on July 27, 2006, IFG requested a determination of applicability of NSPS requirements (40 CFR 60, Subpart Dc) for boiler No. 2. DEQ has reviewed the requirements of 40 CFR 60, Subpart Dc, and has determined that Subpart Dc is not currently applicable to boiler No. 2 because the boiler was constructed in 1975 and has not been modified or reconstructed since June 9, 1989 (the trigger date for Subpart Dc).

5.3 Process No. 3 – Rail Car Target Box and Planer Shavings Cyclone

Table 5.3 lists the emissions units and control devices associated with Rail Car Target Box and Planer Shavings Cyclone.

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

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Target Box	Rail Car Target Box	None	Target box
Planer Cyclone	Planer Shavings Cyclone	Planer shaving cyclone baghouse	Baghouse stack

The rail car target box receives wood chips pneumatically from the sawmill and planer mill, and is classified as a point source due to the presence of an air-displacement stack. The planer shavings cyclone now has a baghouse which was required by July 10, 2001, consent order as part of the DEQ-approved supplemental environmental project.

5.4 Process No. 4 – Miscellaneous Sources

Table 5.4 lists the emissions units and control devices associated with all miscellaneous sources.

Table 5.4 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device
Debarker	None
Bark hog shredder	None
Drying kilns	None
Sawdust bin truck	None
Sawmill chip bin truck loadout	None

The sources listed in this section of the Tier I OP are not currently subject to regulation(s) under any other DEQ-issued permits. These sources have potential PM emission rates exceeding 10% of the significance level in IDAPA 58.01.01.006.92 and do not meet any other criteria for insignificant sources listed in IDAPA 58.01.01.317. These sources are also subject to IDAPA 58.01.01.702. Therefore, they are grouped together in this section with applicable requirements of the *Rules*. The following sources are included in this permit as miscellaneous sources: debarker, bark hog shredder, drying kilns, sawdust bin truck loadout, and sawmill chip bin truck loadout.

5.5 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 5.5 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

Table 5.5 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit / Activity	Regulatory Authority / Justification
Sawmill, indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Sawmill screen (classifier), indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Sawmill chipper, indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Planer, indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Planer chipper, indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Planer trimmer, indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Planer shavings bin truck loadout	IDAPA 58.01.01.317.01(b)(i)(30)

5.6 Non-applicable Requirements for Which a Permit Shield is Requested

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

- A permit shield was not requested.

5.7 Emissions Inventory

Table 5.6 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix A of this statement of basis.

Table 5.6 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)

Source Description	PM ₁₀ T/yr	PM _{2.5} T/yr	NO _x T/yr	SO ₂ T/yr	CO T/yr	VOC T/yr	HAP T/yr	GHG CO ₂ e T/yr
Point Sources								
Lumber Dry Kilns	3.18	1.59	--	--	--	181	24	--
Pneumatic Chip – Target Box	11.15	0.56	--	--	--	--	--	--
Planer Shavings Cyclone BH	9.39	0.94	--	--	--	--	--	--
Planer Chipper Room Dust Cyclone	3.94	0.20	--	--	--	--	--	--
Planer Chip Bin Target Box – Railcar or Truck Bin	2.40	0.12	--	--	--	--	--	--
Boiler #1	96	77	84	9.5	203	6.5	10	See Total
Boiler #2	53	42	77	8.8	306	6.0	9.1	See Total
Fugitive Sources								
Debarker	6.30	0.63	--	--	--	--	--	--
Bark Hog	0.24	0.02	--	--	--	--	--	--
Hog Fuel Transfer to Fuel House	2.43	0.24	--	--	--	--	--	--
Hog Fuel Loading	2.43	0.24	--	--	--	--	--	--
Sawmill, Indoor	1.14	0.11	--	--	--	--	--	--
Sawmill, Screen (Classifier), Indoor	0.56	0.06	--	--	--	--	--	--
Sawmill Chipper, Indoor	0.56	0.06	--	--	--	--	--	--
Sawdust Conveying	2.98	0.30	--	--	--	--	--	--
Sawdust Bin Truck Loadout	2.98	0.30	--	--	--	--	--	--
Sawmill Chip Bin Truck or Railcar Loadout	5.58	0.56	--	--	--	--	--	--
Planer Shavings Bin Truck Loadout	1.20	0.12	--	--	--	--	--	--
Planer Chips Loadout – Railcar or Truck Bin	1.20	0.12	--	--	--	--	--	--
Road Dust	0.36	0.09	--	--	--	--	--	--
Total Emissions	198.2	125.4	160.6	18.3	509	193	42.9	3,000

6. EMISSIONS LIMITS AND MRRR

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

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

This section contains the following subsections:

- Facility-Wide Conditions;
- Emergency Fire Pump Federal Requirements;
- Tier I Operating Permit General Provisions.

MRRR

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

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

State Enforceability

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

Federal Enforceability

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

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

6.1 Facility-Wide Conditions

Permit Condition 3.2 - Fugitive Dust

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

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

MRRR (Permit Conditions 3.3 through 3.5)

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

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

Permit Condition 3.6 - Odors

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

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

MRRR (Permit Condition 3.7)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;

- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

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

Permit Condition 3.8 - Visible Emissions

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

[IDAPA 58.01.01.625, 4/5/00]

MRRR (Permit Condition 3.9 through 3.10)

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

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

Permit Conditions 3.11 through 3.15 - Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the excess emissions facility wide conditions and the regulations of IDAPA 58.01.01.130-136.

MRRR (Permit Conditions 3.11 through 3.15)

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

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

Permit Condition 3.16 – Fuel-Burning Equipment PM Standards

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

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

MRRR

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

Permit Condition 3.17 - Sulfur Content Limits

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

- Distillate fuel oil containing more than the following percentages of sulfur:
 - ASTM Grade 1 fuel oil, 0.3% by weight.
 - ASTM Grade 2 fuel oil, 0.5% by weight.
- Coal containing greater than 1.0% sulfur by weight.
- DEQ may approve an exemption from these fuel sulfur content requirements (IDAPA 58.01.01.725.01 725.04) if the permittee demonstrates that, through control measures or other means, SO₂ emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 3/29/10]

MRRR - (Permit Condition 3.18)

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

[IDAPA 58.01.01.322.06, 5/1/94]

Permit Condition 3.19 - Open Burning

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

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

MRRR

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

Permit Condition 3.20 - Asbestos

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

[40 CFR 61, Subpart M]

MRRR

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

Permit Condition 3.21 - Accidental Release Prevention

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

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

[40 CFR 68.10 (a)]

MRRR

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

Permit Condition 3.22 - Recycling and Emissions Reductions

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

MRRR

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

Permit Condition 3.23 - NESHAP General Provisions

This facility is subject to NESHAP Subparts DDDD and ZZZZ, and is therefore required to comply with applicable General Provisions.

[40 CFR 60, Subpart A]

MRRR

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

Permit Condition 3.24 - Monitoring and Recordkeeping

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

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

MRRR

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

Permit Conditions 3.25 through 3.26 - Performance Testing

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

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

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

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

MRRR (Permit Conditions 3.27 and 3.28)

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

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

Permit Condition 3.29 - Reports and Certifications

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

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

MRRR

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

Permit Condition 3.30 - Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein.

[IDAPA 58.01.01.107, 4/7/11]

MRRR

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

6.2 Emissions Unit-Specific Emissions Limits and MRR

Emergency Fire Pump, 40 CFR 63, Subpart ZZZZ

Permit Condition 8.1 – Compliance Date

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

[40 CFR 63.6595(a)(1)]

Permit Condition 8.2 – Maintenance Requirements

In accordance with 40 CFR 63.6602, the following emission limits or operating restrictions are required for the 220 bhp engine. The permittee must meet the following requirements, except during periods of startup.

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

[40 CFR 63.6602]

Permit Condition 8.3 – Startup Time Requirements

The engine's time spent at idle during startup shall be minimized to a period needed for appropriate and safe loading of the engine, but not to exceed 30 minutes, after which time the emission standards associated with this permit apply in accordance with 40 CFR 63.6602.

[40 CFR 63.6602]

Permit Condition 8.4 – Pollution Control Requirements

The permittee shall operate and maintain the diesel engine(s) and associated pollution control equipment (where applicable) in a manner that minimizes emissions. Nothing further is required to reduce emissions other than what is necessary to meet the appropriate limitation in the Maintenance Requirements permit condition in accordance with 40 CFR 63.6605.

[40 CFR 63.6605]

Permit Condition 8.5 – Non-resettable hour meter

In accordance with 63.6625(f), an existing emergency stationary RICE located at a major source of HAP emissions must install a non-resettable hour meter if one is not already installed.

[40 CFR 63.6625(f)]

Permit Condition 8.6 – Alternative Maintenance Requirements

In accordance with 40 CFR 63.6625(i), the permittee has the option of implementing an oil analysis program to extend the specified oil change frequency in the Maintenance Requirements permit condition. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters:

- Total Base Number, viscosity, and percent water content.

The limits for these parameters are as follows:

- Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5.

If any of the limits are exceeded, and the IC engine is in operation, the permittee must change the oil within two days of receiving the results of the analysis. If any of the limits are exceeded, and the IC engine is not in operation, the permittee must change the oil within two days or before commencing operation of the IC engine, whichever is later.

The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

[40 CFR 63.6625(i)]

Permit Condition 8.7 – Emergency Situation Operations

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

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

MRRR - (Permit Condition 8.8)

In accordance with 40 CFR 63.6655(e), the permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following Rice; (1) an existing stationary emergency RICE.

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

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

[40 CFR 63.6655(e-f), 63.6660]

All MRRR for the emergency fire pump is captured with this permit condition and the requirements of the subpart.

Permit Condition 9.1

Boiler No. 1 and No. 2 are subject to 40 CFR 63, Subpart DDDDD. The final rule was promulgated on March 21, 2011. Its effectiveness was then delayed by the EPA on May 18th, 2011. The rule has been under reconsideration with proposed changes since December 23, 2011. Until such time EPA issues the final rule, no further requirements of the Subpart are added to the permit at this time. Applicable requirements will be added to the permit during the next amendment, revision, reopening for cause or renewal action. Therefore, this section is reserved for Subpart DDDDD.

MRRR

No MRRR is necessary as this condition is merely a placeholder for the Subpart when the reconsideration is finalized. Please see the 40 CFR 63, Subpart DDDDD of this Statement of Basis for further detail regarding the status of the Subpart.

6.3 General Provisions

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

General Compliance, Duty to Comply

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

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

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

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

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

General Compliance, Duty to Supplement or Correct Application

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

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

Reopening, Additional Requirements, Material Mistakes, Etc.

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

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

Reopening, Permitting Actions

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

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

Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

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

Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

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

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

Changes Requiring Permit Revision or Notice

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

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

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

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

Federal and State Enforceability

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

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

Inspection and Entry

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

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

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

New Applicable Requirements

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

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

Fees

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

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

Certification

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

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

Renewal

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

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

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

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

Permit Shield

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

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

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;
IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

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

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

Periodic Compliance Certification

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

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified;
- All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months as specified.

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

Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

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

Permit Revision Not Required, Emissions Trading

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

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

Emergency

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

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

7. REGULATORY REVIEW

7.1 Attainment Designation (40 CFR 81.313)

The facility is located in Bonner County which is designated as attainment or unclassifiable for PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone. Reference 40 CFR 81.313.

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

This facility is a major facility as defined by IDAPA 58.01.01.008.10 because it emits or has the potential to emit PM, NO_x, CO and VOC in amounts greater than or equal to major facility threshold(s) listed in Subsection 008.10. The AIRS facility classification is A.

7.3 PSD Classification (40 CFR 52.21)

IFG is a PSD major facility as defined by 40 CFR 52.21 because it emits or has the potential to emit CO in amount greater than 250 tons per year. The facility applied for a renewal in accordance with IDAPA 58.01.01.369. During the permitting process, the fire pump was determined to be subject to a federal NESHAP, Subpart ZZZZ. In accordance with IDAPA 58.01.01.317.01, the pump can longer be considered an insignificant activity. Therefore, all applicable requirements of the subpart we added. These changes are not considered a minor nor a significant permit modification with regard to Title V pursuant to IDAPA 58.01.01.382 (significant permit modification) and 383 (minor permit modification). There is no change of emissions resulting from this renewal. Therefore, PSD review was not triggered.

7.4 NSPS Applicability (40 CFR 60)

Because the facility has steam generating boilers 40 CFR 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial Institutional Steam generating units may be applicable to IFG, Laclede.

40 CFR 60, Subpart Dc Standards of Performance for Storage Vessels for Small Industrial-Commercial Institutional Steam Generating Units

§ 60.40c Applicability and delegation of authority.

(a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/h)) or less, but greater than or equal to 2.9 MW (10 MMBtu/h).

This subpart applies to steam generating units (i.e., boilers) with a design heat capacity of 100 MM Btu/hr or less. The Perry Smith ABCO (wood-fired boiler No. 1) and Kipper and Sons (wood-fired boiler No. 2), each with nominal design capacity of less than 100 MM Btu/hr, were manufactured in 1976 and 1975, respectively, prior to the promulgated date of June 9, 1989 of the proposed Subpart Dc Rules. Therefore, this NSPS does not apply.

The emergency fire pump may be applicable to 40 CFR 60, Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

40 CFR 60, Subpart III.....Standards of Performance for Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

§ 60.4200 Am I subject to this subpart?

(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) and other persons as specified in paragraphs (a)(1) through (4) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

(2) Owners and operators of stationary CIICE that commence construction after July 11, 2005, where the stationary CIICE are:

(i) Manufactured after April 1, 2006, and are not fire pump engines, or

(ii) Manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006.

The model year for the fire pump diesel engine generator at the facility is earlier than 2005, therefore this source is not subject to this subpart.

7.5 NESHAP Applicability (40 CFR 61)

IFG, Laclede facility is not in any of the applicable source categories subject to regulation under 40 CFR 61.

7.6 MACT Applicability (40 CFR 63)

40 CFR 63, Subpart DDDDD.....National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters

§ 63.7485 Am I subject to this subpart?

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler or process heater as defined in §63.7575 that is located at, or is part of, a major source of HAP as defined in §63.2 or §63.761.

Boiler No. 1 and No. 2 are subject to 40 CFR 63, Subpart DDDDD. The final rule was promulgated on March 21, 2011. Its effectiveness was then delayed by the EPA on May 18th, 2011. The rule has been under reconsideration with proposed changes since December 23, 2011. A public comment period was held through February 21, 2012. The U.S. District Court vacated the delay at reinstated the March 2011 rule on January 9, 2012. In addition, a No Action Assurance Letter was issued on February 7, 2012 indicating that enforcement discretion would be used when considering notification deadlines. Also, with agreement from EPA Region X, Idaho DEQ has instituted a Department policy whereby no permits will Subpart DDDDD requirements until a clear resolution has been determined. However, Section 9 of the permit has included Subpart DDDDD as an applicable requirement. This was added as a placeholder.

Should an update need to be made to the permit to incorporate any new applicable requirements, Idaho DEQ will follow the procedures outlined in IDAPA 58.01.01.386. The rule is as follows: *Additional applicable requirements become applicable to a major Tier I source with a remaining permit term of three (3) or more years; provided that no such reopening is required if the original effective date of the applicable requirement is later than the date on which the Tier I operating permit is due to expire and the original Tier I operating permit or any of its terms and conditions has not been extended pursuant to Section 368; provided further that the permittee must comply with the additional applicable requirement no later than the effective date;*

Essentially, should there be three or more years remaining of the permit term when the requirements go into effect, the Department may opening the permit for cause to incorporate the new requirements. However, should there be fewer than three years, the new requirements will be added during the next renewal. Should the Department reopening the permit, the permittee will be notified a minimum of 30 days prior to reopening. This would strictly be a DEQ-initiated action and not require any action by IFG. DEQ has elected to procedure in this manner due to the uncertainty surrounding DDDDD. DEQ feels that it would a more efficient to include all applicable requirements once all proposed actions are reviewed and incorporated into the rule rather have to make changes twice.

**40 CFR 63, Subpart DDDD.....National Emission Standards for Hazardous Air Pollutants:
Plywood and Composite Wood Products**

§ 63.2231 *Does this subpart apply to me?*

This subpart applies to you if you meet the criteria in paragraphs (a) and (b) of this section.

(a) You own or operate a PCWP manufacturing facility. A PCWP manufacturing facility is a facility that manufactures plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product. Plywood and composite wood products manufacturing facilities also include facilities that manufacture dry veneer and lumber kilns located at any facility. Plywood and composite wood products include, but are not limited to, plywood, veneer, particleboard, oriented strandboard, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.

(b) The PCWP manufacturing facility is located at a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (10 tons) or more per year or any combination of HAP at a rate of 22.68 megagrams (25 tons) or more per year.

The facility is a major source of HAPs which includes lumber dry kilns. Thus, this subpart applies.

§ 63.2232 *What parts of my plant does this subpart cover?*

(a) This subpart applies to each new, reconstructed, or existing affected source at a PCWP manufacturing facility.

(b) The affected source is the collection of dryers, refiners, blenders, formers, presses, board coolers, and other process units associated with the manufacturing of plywood and composite wood products. The affected source includes, but is not limited to, green end operations, refining, drying operations (including any combustion unit exhaust stream routinely used to direct fire process unit(s)), resin preparation, blending and forming operations, pressing and board cooling operations, and miscellaneous finishing operations (such as sanding, sawing, patching, edge sealing, and other finishing operations not subject to other national emission standards for hazardous air pollutants (NESHAP)). The affected source also includes onsite storage and preparation of raw materials used in the manufacture of plywood and/or composite wood products, such as resins; onsite wastewater treatment operations specifically associated with plywood and composite wood products manufacturing; and miscellaneous coating operations (§63.2292). The affected source includes lumber kilns at PCWP manufacturing facilities and at any other kind of facility.

(c) An affected source is a new affected source if you commenced construction of the affected source after January 9, 2003, and you meet the applicability criteria at the time you commenced construction.

The lumber kilns are affected existing source.

§ 63.2252 *What are the requirements for process units that have no control or work practice requirements?*

For process units not subject to the compliance options or work practice requirements specified in §63.2240 (including, but not limited to, lumber kilns), you are not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of this subpart, or any other requirements in subpart A of this part, except for the initial notification requirements in §63.9(b).

There are no requirements as stated in 63.2240 that are applicable to the facility, specifically the drying kilns, other than the initial notification requirement. The notification was submitted by the former owner, Riley Creek Lumber, on January 25, 2005. Because the notification was previously submitted there was no need to include any requirements in the permit.

40 CFR 63, Subpart ZZZZ.....National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

§ 63.6585 *Am I subject to this subpart?*

You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

(b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.

The emergency fire pump engine is a compression-ignition RICE and the facility is a major source for HAPs. Therefore, the engine is subject to the ZZZZ subpart.

§ 63.6590 *What parts of my plant does this subpart cover?*

This subpart applies to each affected source.

(a) Affected source. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

(1) Existing stationary RICE.

(ii) For stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

The engine is considered an affected, existing source as in was installed in 2004 and is 220 hp.

§ 63.6595 *When do I have to comply with this subpart?*

*(a) Affected sources. (1) If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than June 15, 2007. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, **an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions**, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013.*

The engine at IFG, Laclede is an existing RICE with a 220 hp at a major source of HAPs. Therefore, all ZZZZ requirements go into effect May 3, 2013. This requirement is ensured in Permit Condition 8.1.

§ 63.6602 *What emission limitations must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?*

If you own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions, you must comply with the emission limitations in Table 2c to this subpart which apply to you. Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this subpart.

Emergency compression-ignition engines must comply with applicable requirements identified in Table 2c of the Subpart. The operational requirements include oil and filter changes every 500 hours of operation or annually, whichever is first. Air cleaner inspections must occur every 1,000 hours of

operation or annually, whichever is first. Lastly, hoses and belts shall be inspected every 500 hours of operation or annually, whichever is first. These requirements are ensured by Permit Condition 8.2 Startup restrictions are also identified in table 2c and is ensured by Permit Condition 8.3.

§ 63.6605 *What are my general requirements for complying with this subpart?*

(a) *You must be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times.*

(b) *At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator 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.*

These requirements indicate that the emergency fire pump be maintained and operated in a manner that minimizes emissions. This is ensured by Permit Condition 8.4.

§ 63.6625 *What are my monitoring, installation, collection, operation, and maintenance requirements?*

(i) *If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. 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 engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine 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 engine. The analysis program must be part of the maintenance plan for the engine.*

(f) *If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.*

6625(i) provides IGF, Laclede the options for alternative maintenance options if so desired. The frequency of the oil changes may differ if the individualized oil analysis program meets specific criteria. Records must be maintained should the program be implemented. This option is ensured by Permit Condition 8.6.

A non-resettable meter must be installed in not already done. This requirement is ensured by Permit Condition 8.5.

§ 63.6640 *How do I demonstrate continuous compliance with the emission limitations and operating limitations?*

(f) *Requirements for emergency stationary RICE. (1) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a new or reconstructed emergency stationary RICE with a site rating of more than 500*

brake HP located at a major source of HAP emissions that was installed on or after June 12, 2006, or an existing emergency stationary RICE located at an area source of HAP emissions, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.

(i) There is no time limit on the use of emergency stationary RICE in emergency situations.

(ii) You may operate your emergency stationary RICE 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 of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.

(iii) You may operate your emergency stationary RICE 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. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.

All emergency engine specific requirements are ensured by Permit Condition 8.7.

§ 63.6645 *What notifications must I submit and when?*

(a) You must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified if you own or operate any of the following;

(1) An existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.

(5) This requirement does not apply if you own or operate an existing stationary RICE less than 100 HP, an existing stationary emergency RICE, or an existing stationary RICE that is not subject to any numerical emission standards.

No notifications are required for the emergency engine.

§ 63.6650 *What reports must I submit and when?*

(a) You must submit each report in Table 7 of this subpart that applies to you.

There are no reports as Table 7 requirements do not apply.

§ 63.6655 *What records must I keep?*

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;

(2) An existing stationary emergency RICE.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator 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 the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

(1) An existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions that does not meet the standards applicable to non-emergency engines.

Records must be maintained for maintenance performed. Also, emergency operation must be documented. Permit Condition 8.8 ensures this requirement.

§ 63.6660 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

Records must be kept for a minimum of 5 years and readily accessible. Permit Condition 8.8 ensures this requirement.

7.7 CAM Applicability (40 CFR 64)

The CAM rule under 40 CFR part 64 requires monitoring for specific emissions units at a facility that is subject to the Title V regulations (required to obtain a Tier I operating permit from the State of Idaho). The CAM rule applies to a specific subset of emissions units at Clean Air Act, Title V facilities that meet the following requirements: (1) located at a major source that is required to obtain a Title V permit (40 CFR part 70 or 71), (2) subject to an emission limit or standard for the applicable pollutant, (3) uses a control device to achieve compliance, (4) has potential pre-control emissions of the applicable pollutant from the unit that are at least at the major source level, and (5) is not otherwise exempt (i.e., units subject to New Source Performance Standards (NSPS) or National Emission Standard for Hazardous Air Pollutants (NESHAP) that were proposed after November 1990 are not subject to the CAM rule, units subject to Acid Rain requirements are not being subject to the CAM rule. Emissions equipped with a continuous compliance determination method that is required by a rule or permit, such a continuous emissions monitors, are also exempt from CAM (40 CFR 64.2(b)(vi)). Basically, CAM monitoring is specific to large emissions units at Title V facilities that use add-on control devices to achieve compliance with emissions limits.

Monitoring Design Criteria §64.3 & Approved Monitoring §64.6

The monitoring design criteria of CAM is summarized as follows:

General Criteria

Monitoring Shall:

Obtain data for one or more indicators. §64.3(a)(1)

Provide a range of the indicators such that operation within those range(s) provides a reasonable assurance of compliance. §64.3(a)(2)&((3)

Performance Criteria

The monitoring methods shall:

Provide for obtaining data that are representative of the emissions parameters being monitored. §64.3(b)(1)

Quality assurance and control to assure continuing validity of the data collected. §64.3(b)(3)

Specifications for the frequency of conducting the monitoring. For units with after control emissions of 100 tons per year or greater frequency shall not be less than every 15 minutes. For other units frequency shall not be less than once per 24-hours. §64.3(b)(4)

Continuous opacity monitoring (COMS) that is already required by MACT (40 CFR 63) or NSPS (40 CFR 60) standard shall be deemed to satisfy the CAM monitoring Design Criteria. Provided that a COMS may be subject to the criteria for establishing an indicator range. §64.3(d)(2)

Approved Monitoring §64.6

At a minimum, the permit shall specify the following for the approved monitoring:

(1) The approved monitoring approach that includes all of the following:

The indicator(s) to be monitored (such as temperature, pressure drop, emissions, or similar parameter);

(ii) The means or device to be used to measure the indicator(s) (such as temperature measurement device, visual observation, or CEMS); and

(iii) The monitoring performance requirements established to satisfy §64.3(b) or (d), as applicable.

(2) The means by which the owner or operator will define an exceedance or excursion for purposes of responding to and reporting exceedances or excursions under §§64.7 and 64.8 of this part. The permit shall specify the level at which an excursion or exceedance will be deemed to occur, including the appropriate averaging period associated with such exceedance or excursion. For defining an excursion from an indicator range or designated condition, the permit may either include the specific value(s) or condition(s) at which an excursion shall occur, or the specific procedures that will be used to establish that value or condition. If the latter, the permit shall specify appropriate notice procedures for the owner or operator to notify the permitting authority upon any establishment or reestablishment of the value.

Following are discussions on the CAM monitoring requirements for each affected emissions unit. The requirements are included in Tier I permit conditions 9.1 through 9.12.

CAM for Boilers Nos. 1 and No. 2

In satisfying monitoring design criteria for PM and grain loading emissions from boilers Nos.1 and 2 per 40 CFR 64.3(d)(2), indicators and indicator ranges multiclones (pressure drop across the multiclones) and the ESP voltage and current that applied by each T/R set to the discharge electrodes) for the boilers were selected by the IFG based on performance testing of each boiler which assured compliance with the applicable emissions standards. The PM emissions testing were conducted by the IFG on September 30, 2008. The following indicators and indicator ranges were determined to be used to assure compliance with the applicable CAM particulate and grain loading standards:

Pressure drop across each of the multiclones; range is 0.5-5.9 inches of water column (w.c.)

The ESP Transformer/Rectifier for each boiler; CAM indicator range for ESP voltage is 30-45 kV; and the ESP current range is 10-150 mA current output.

The CAM plan is detailed in IFG's supplemental information received by DEQ on February 27, 2009. The plan includes a listing of all standards applicable to boiler No. 1 and boiler No. 2 which shows the selected indicator ranges provide reasonable assurance compliance. Monitoring the pressure drops for

each of the multiclones and the ESP's voltage and current applied by each T/R set is presumptively acceptable monitoring approach and DEQ approves that proposed monitoring method for CAM purposes.

No indicator of excursions were submitted by the IFG in accordance with 40 CFR 64.8(a). However, in accordance with Permit Condition 9.10 DEQ may require the owner or operator of the boilers to develop and implement a quality improvements plan (QIP) in accordance with 40 CFR 64.8(a) if an accumulation of exceedances or excursions exceeding 5% duration of a pollutant-specific emissions unit's operating time for a reporting period occurs.

The CAM supplemental plan that was received by IFG on February 27, 2009 and the DEQ review of PM performance tests on the boilers Nos. 1 and 2 stacks conducted at IFG, Laclede, on September 30, 2008 are included in Appendix B of this statement of basis of the previous Tier I permit issued, January 11, 2010.

Permit Condition 9.13 states that if there is a conflict between the CAM requirements of the permit, the CAM shall govern. These permit conditions do not include any requirements beyond those of the CAM.

CAM Non-Applicability for the Rail Car Target Box and Planer Shavings Cyclone Baghouse

In this process the cyclone and the baghouse are connected in series. The cyclone is used as a process equipment to collect the shavings from the planer mill. The cyclone is considered to be inherent to the process. The PM that is emitted from the cyclone is considered an input to the baghouse. The baghouse cleans the emissions from the cyclone. The PM and PM₁₀ emissions are estimated to be 43.4 and 21.7 T/yr, respectively. These emissions are estimated as follows:

Given:

Design flow rate of the shavings cyclone is 50,000 cfm

Emission factors for the planer shavings cyclone is 0.0005 gr/dscf for PM_{2.5} and 0.005 gr/dscf for PM₁₀ (reference: Manufacturer's Guarantee Baghouse Emission Rate, 10% of PM₁₀ assumed to be PM_{2.5})

PM_{2.5}: 0.0005 gr/dscf x 50,000 x 60 min/1 hr x 1 lb/7000 gr x 8760 hr/1yr x 1 ton/2000 lb = 0.94 T/yr

PM₁₀: 0.005 gr/dscf x 50,000 x 60 min/1 hr x 1 lb/7000 gr x 8760 hr/1yr x 1 ton/2000 lb = 9.39 T/yr

The above estimations show that CAM does not apply to this source because the PM and the PM₁₀ emissions from the shavings cyclone is less than 100 T/yr each. These emissions are considered to be the pre-controlled emissions for the baghouse, which are below the 100 T/yr thresholds for CAM applicability (40 CFR 64.2). Therefore, CAM does not apply to the baghouse.

Operation of Approved Monitoring §64.7

The generally applicable requirements for approved monitoring required by §64.7 have been included in the permit (Sections 9.3-9.6). These requirements include:

§64.7(a) Commencement of Operation – The permittee must conduct the approved monitoring upon permit issuance (unless other time is approved).

§64.7(b) Proper Maintenance – The permittee must properly maintain monitoring equipment, including maintaining parts to repair monitoring equipment.

§64.7(c) Continued operation - The permittee must conduct all monitoring in continuous operation at all times the emission unit is operation. Exception is provided for malfunctions, repairs, calibration, etc.

§64.7(d) Response to excursions or exceedances - Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

§64.7(e) Documentation of need for improved monitoring - After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while

providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit.

Quality Improvement Plan §64.8

The ability for the permitting authority to reopen the permit to require the development of a quality improvement plan has been included in the permit at Section 9.10. An accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, may be a cause for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria.

Reporting and Recordkeeping §64.9

The reporting and recordkeeping requirements are included in Section 9.11-9.12 and by General Provision 11.25 and 11.26. Reports are required semiannually; if deviations from permit conditions occurred during the reporting period they shall be included in the report.

Recordkeeping requirements are also included in Facility-Wide Permit Condition 3.24.

Renewed Permit Conditions 4.14 and 5.15 require a performance test once each five years, which in combination with CAM requirements provides a reasonable assurance of compliance with particulate matter standards.

7.8 Acid Rain Permit (40 CFR 72-75)

This facility is not an affected facility as defined in 40 CFR 72 through 75; therefore, acid rain permit requirements do not apply.

8. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from **DATE to DATE**. During this time, comments **WERE / WERE NOT** submitted in response to DEQ's proposed action. *{If comments were received, include the following text.}* A response to public comments document has been crafted by DEQ based on comments submitted during the public comment period. That document is part of the final permit package for this permitting action.

IF A PUBLIC HEARING IS PROVIDED:

In addition to the public comment period, DEQ also provided a public hearing for persons interested to appear and submit written or oral comments. The public hearing was provided on **DATE in CITY**. DEQ's response to the comments submitted during the public hearing is also included in the response to public comments document.

9. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on **DATE** via e-mail. On **DATE**, EPA Region 10 responded to DEQ via e-mail indicating **EPA RESPONSE**.

Appendix A - Emissions Inventory

Appendix B - Facility Comments for Draft Permit

The following comments were received from the facility on April 30, 2012:

Facility Comment #1: Cover Page. The draft does not include the cover page. When the cover page is added, the phone number for Mike Henley should be changed to (208) 255-3220. Phone number for Scott Atkison is unchanged.

DEQ Response: DEQ has updated the Cover Page since the last permit issued to IFG – Laclede. The cover that was provided with the draft is consistent with the new page. While, contact information for the permitted facility has been removed, it is still maintained in the DEQ database. Therefore, the requested change to the phone number has been made.

Facility Comment #2: Section 3. It appears that the first section should be numbered Condition 3.1.

DEQ Response #2: The first condition in Section 3 that includes Table 3.1 has been updated and numbered as Condition 3.1.

Facility Comment #3: Conditions 3.16, 4.3 and 5.3, Fuel-burning Equipment. Condition 3.16 is redundant to Conditions 4.3 and 5.3, and also seems incomplete. Condition 4.3 references boilers with heat input less than 10 MMBtu/hr, when it should be greater than or equal to 10 MMBtu/hr. These errors were there all along, we just didn't notice.

DEQ Response #3: Conditions 4.3 and 5.3 were reviewed and determined to be correct. Condition 4.3 references boilers of less than 10 MMBtu/hr, but there is also an "OR" in the language. This clearly indicates that for Minor and Existing Sources to be applicable the unit either needed to have commenced operation prior to October 1, 1979, **or** have a maximum rated input less than 10 MMBtu/hr. Because the ABCO boiler (Boiler No. 1) meets the operational date requirement, the condition is accurate. It also is written such that it is consistent with the verbiage in the applicable rule IDAPA 58.01.01.677.

Permit Condition 3.16 was redundant as there are no other fuel-burning equipment located at the facility. Therefore, the condition has been removed.

Facility Comment #4: NESHAPS, Conditions 3.23, 3.30, and all of Section 8. It's odd to have so much detail about NESHAP Subpart ZZZZ and no detail on NESHAP Subpart DDDD or NESHAP Subpart DDDDD that will eventually (very soon) apply to the Boilers. Subpart DDDD doesn't contain specific requirements for lumber kilns, but that should be explained in the permit. Subpart DDDDD is going to be a huge increase in regulations. If IDEQ doesn't include Subpart DDDDD in this permit renewal, they will have to reopen the permit later to add it. There should at least be a place-holder section for Subpart DDDDD in this permit.

DEQ Response #4: The requirements of ZZZZ were included in detail in the permit because it is a currently enforceable MACT with specific applicable conditions. Conversely, DDDD does not have applicable requirements that IFG needs to continue to comply with. The only requirement of initial notification was already conducted. Therefore, there is no need to expand any discussion in the permit related to DDDD. The Statement of Basis outlines that the kilns are considered an affected source, but IGF is not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of this subpart, or any other requirements in subpart A of this part, except for the initial notification requirement.

Subpart DDDDD was promulgated on March 21, 2011. It was subsequently delayed on May 18, 2011. A reconsideration proposal was introduced on December 23, 2011. On January 9, 2012 the United States District Court vacated the May 18th delay. As a result, the March 21st final rule is now effective. However, comments and review of the proposed changes are still ongoing. It is likely that substantial changes will be made. Because of the level of uncertainty the EPA has issued a No Action Assurance letter regarding notification and tune-up deadlines. Also, we agree from EPA Region X, Idaho DEQ has instituted a Department policy whereby no permits will Subpart DDDDD requirements until a clear resolution has been determined. For up-to-date information regarding this rule see the following link: <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>

However, Section 9 was added to include Subpart DDDDD as an applicable requirement. This was added as a placeholder. Further detail can be found in the updated Statement of Basis under the MACT section for Subpart DDDDD.

Should an update need to be made to the permit to incorporate any new applicable requirements, Idaho DEQ will follow the procedures outlined in IDAPA 58.01.01.386. This is also detailed further in the Subpart DDDDD section of this Statement of Basis.

Facility Comment #5: Condition 8.1 names the permittee as IFG, Laclede. This is the only place in the permit. It should just say permittee

DEQ Response #5: The requested change has been made.

Facility Comment #6: Condition 9.2 states that the emission limit on Boiler No. 2 is 0.80 gr/dscf, when it should be 0.080 gr/dscf.

DEQ Response #6: The requested change has been made (now condition 10.2).

Facility Comment #7: Table 9.1. The title says Boilers No. 1/2. It should say Boilers No. 1 and No. 2. Under the “Data collection Procedure” row, for all three indicators, the wording is misleading. It should say: “The pressure drop shall be recorded manually in the boiler operating log. Records shall be maintained for a minimum of 5 years.”

DEQ Response #7: The requested changes have been made (now condition 10.1).

Facility Comment #8: Conditions 9.5, 9.6 and others. The boilers should be called off as Boiler No. 1 and Boiler No. 2 for consistency.

DEQ Response #8: The requested changes have been made (now part of Section 10).

Facility Comment #9: Condition 9.8. This refers to an excursion as a measured emission of a pollutant. To be consistent with Table 9.1, it should be measurement outside the indicator ranges.

DEQ Response #9: Condition 10.8 (9.8 in previous draft) has been updated to indicate an excursion is a measurement outside the specified ranges. This is consistent with information in Table 10.1 (9.1 in previous draft). Thus, the requested change was made.