



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

C.L. "Butch" Otter, Governor
Curt Fransen, Director

October 15, 2014

Larry Lloyd
Plant Manager, Paul Facility
The Amalgamated Sugar Company LLC
50 South 500 West
Paul, Idaho 83347

RE: Facility ID No. 067-00001, The Amalgamated Sugar Company -- Paul Facility (TASCO-Paul)
Final Tier I Operating Permit Letter

Dear Mr. Lloyd:

The Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. T1-050414 Project 0414 to TASCO-Paul in accordance with IDAPA 58.01.01.300 through 386, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units. This permit replaces Tier I Operating Permit No. T1-030416, issued September 23, 2005. The enclosed operating permit is based on the information provided in your permit application received on June 15, 2005 and supplements. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the *Rules*.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Regional Air Quality Manager, at (208) 736-2190 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/ML Permit No. T1-050414 Project 0414

Enclosure

Air Quality

TIER I OPERATING PERMIT

Permittee The Amalgamated Sugar Company LLC
(TASCO – Paul)

Permit Number T1-050414

Project ID 0414

Facility ID 067-00001

Facility Location 50 South 500 West
Paul, ID 83347

Permit Authority

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

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

Date Issued October 15, 2014

Date Expires October 15, 2019



Morrie Lewis, Permit Writer



Mike Simon, Stationary Source Manager

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1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

ASTM	American Society for Testing and Materials
Btu	British thermal units
B&W	Babcock & Wilcox
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CaO	calcium oxide
CEMS	continuous emissions monitoring systems
CFR	Code of Federal Regulations
CMS	continuous monitoring system
CO	carbon monoxide
CO ₂	carbon dioxide
COMS	continuous opacity monitoring system
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hr	hour
ID No.	identification number
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
iwg	inches of water gauge
klb/yr	thousands of pounds per campaign year
km	kilometers
lb	pounds
MACT	Maximum Achievable Control Technology
mg/L	milligrams per liter
MMBtu	million British thermal units
MSP	monitoring system performance
NESHAP	National Emission Standards for Hazardous Air Pollutants
ng/J	nanograms per joule
No.	number
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O ₂	oxygen
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 by volume
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PW	process weight rate
QA/QC	quality assurance and quality control

QIP	Quality Improvement Plan
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIP	State Implementation Plan
SO ₂	sulfur dioxide
TASCO	The Amalgamated Sugar Company LLC
T1	Tier I operating permit
T/day	tons per day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
U.S.C.	United States Code
VOC	volatile organic compounds

2. PERMIT SCOPE

Purpose

2.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan (SIP) control strategy and the Rules.

This permit establishes Compliance Assurance Monitoring (CAM) requirements for the B&W Boiler, Erie City Boiler, North Pulp Dryer, and South Pulp Dryer.

This permit is a Tier I operating permit renewal.

2.2 This Tier I operating permit incorporates the following permits:

- Permit to Construct No. P-050406, issued July 27, 2005
- Permit to Construct No. P-2010.0043 PROJ 61325, issued March 18, 2014
- Permit to Construct No. P-2011.0040 PROJ 61314, issued August 13, 2014

2.3 This Tier I operating permit supersedes Tier I Operating Permit No. T1-030416, issued September 23, 2005.

Regulated Sources

2.4 Table 2.1 lists all sources of regulated emissions in this permit, for informational purposes.

Table 2.1 REGULATED SOURCES

Permit Sections	Source Description	Control Equipment
3 & 4	<u>B&W Boiler (S-B1)</u> Operational capacity: 175,000 lb/hr steam Fuel consumption: 13.2 T/hr Fuels: coal and/or natural gas ^(a)	Multiclone (A-B1A) and Spray-Chamber Scrubber (A-B1B) in series ^(a)
3 & 5	<u>Erie City Boiler (S-B2)</u> Operational capacity: 250,000 lb/hr steam (gas) 220,000 lb/hr steam (coal) Fuel consumption: 16.8 T/hr Fuels: coal and/or natural gas ^(a)	Multiclone (A-B2A) and Spray-Chamber Scrubber (A-B2B) in series ^(a)
3 & 6	<u>Nebraska Boiler (S-B3, Backup Boiler Only)</u> Operational capacity: 200,000 lb/hr steam Fuel consumption: 250 MMBtu/hr Fuels: natural gas	None
3 & 7	<u>North Pulp Dryer (S-D2)</u> PW input rate: 56.9 T/hr Fuel consumption: 5.7 T/hr Fuels: coal and/or natural gas	Dryer exhaust is split between two cyclones (A-D2A) that operate in parallel. Cyclone exhaust is combined and then split between two Spray-Impingement Scrubbers (A-D2B) that operate in parallel.
	<u>South Pulp Dryer (S-D1)</u> PW input rate: 48.5 T/hr Fuel consumption: 4.9 T/hr Fuels: coal and/or natural gas	Dryer exhaust is split between two cyclones (A-D1A) that operate in parallel. Cyclone exhaust is combined and then split between two Spray-Impingement Scrubbers (A-D1B) that operate in parallel.
3 & 8	<u>Pellet Cooler No. 1 (S-D3)</u> Manufacturer/Model: California Pellet Mill/2GA3 PW input rate: 7.5 T/hr	Cyclone (A-D3)
	<u>Pellet Cooler No. 2 (S-D4)</u> Manufacturer/Model: California Pellet Mill/2GA3 PW input rate: 7.5 T/hr	
	<u>Pellet Cooler No. 3 (S-D5)</u> Manufacturer/Model: California Pellet Mill/2GA3 PW input rate: 7.5 T/hr	Cyclone (A-D4/5)
3 & 9	<u>Lime Kiln System (S-K1)</u> Manufacturer: Eberhardt Model: KR 8.0 (forced draft, vertical) Manufacture date: 2011 Maximum capacity: 770 T/day lime rock Maximum operation: 146,300 T/yr lime rock Fuel consumption: 55.2 T/day, 59 MMBtu/hr Fuels: anthracite coal and/or coke	Gas Washer First Carbonation Tank Second Carbonation Tank (A-K1)

a) Boilers will be limited to natural gas-firing only on the compliance date specified in Permit Condition 3.7. At such time, the listed control equipment will no longer be required.

3. FACILITY-WIDE CONDITIONS

Table 3.1 contains a summary of requirements that apply generally to emissions units at the facility.

Table 3.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
3.1	Definitions	Definitions for permit conditions	P-2011.0040	3.1
3.2–3.4	Beet Throughput	19,550 T/day 3,500,000 T/yr	P-2011.0040 40 CFR 52.21	3.4, 3.45–3.46
3.5–3.6	Boiler Steam Production	2,050,000 klb/yr	P-2011.0040 40 CFR 52.21	3.6, 3.45–3.46
3.7–3.9	Boiler Fuel Usage & Conversion	104,900 T/yr	P-2011.0040	3.8, 3.45–3.46
3.10–3.11	Boiler MACT	Compliance with NESHAP 40 CFR 63, Subparts A and DDDDD	P-2011.0040 40 CFR 63, Subparts A and DDDDD	3.10–3.11, 3.45–3.46, 3.47
3.12–3.14	Annual Emissions Monitoring	Compliance with “reasonable possibility” monitoring	P-2011.0040 40 CFR 52.21	3.13–3.14, 3.45–3.46
3.15	Air Pollution Emergency	Compliance with IDAPA 58.01.01.550-562	P-2011.0040, IDAPA 58.01.01.550-562	3.15, 3.45–3.46
3.16–3.19	Fugitive Dust	Reasonable control	IDAPA 58.01.01.650–651	3.17–3.19, 3.45–3.46
3.20–3.21	Odors	Reasonable control	IDAPA 58.01.01.775–776	3.21, 3.45
3.22–3.24	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.23–3.24, 3.45–3.46
3.25–3.29	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130–136	3.25–3.29, 3.45–3.46
3.30–3.31	Sulfur Content	1% sulfur by weight for coal, as received	IDAPA 58.01.01.725 40 CFR 52.21	3.31, 3.45–3.46
3.32	Open Burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600–623	3.32, 3.45–3.46
3.33	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	3.33, 3.45–3.46
3.34	Recycling and Emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	3.34, 3.45–3.46
3.35	Accidental Release Prevention	Compliance with 40 CFR 68	40 CFR 68	3.35, 3.45–3.46
3.36–3.39	Operation and Maintenance	Compliance with O&M requirements	P-2010.0043, IDAPA 58.01.01.322	3.37–3.39, 3.45–3.46
3.40–3.44	Performance Testing	Compliance testing	IDAPA 58.01.01.157	3.40–3.44, 3.45–3.46
3.45	Monitoring and Recordkeeping	Maintenance of required records	IDAPA 58.01.01.322	3.45–3.46
3.46	Reports and Certifications	Submittal of required reports, notifications, and certifications	IDAPA 58.01.01.322	3.46
3.47	Incorporation of Federal Requirements by Reference	Compliance with applicable federal requirements referenced	IDAPA 58.01.01.107	3.47

Definitions

- 3.1 "Campaign year" shall be defined as the year beginning October 1 and ending the following year on September 30.

[P-2011.0040, 8/13/14]

Beet Throughput

- 3.2 Throughput of beets to the facility shall not exceed 19,550 tons per day (T/day).

[P-2011.0040, 8/13/14]

- 3.3 Throughput of beets to the facility shall not exceed 3,500,000 tons per campaign year.

[P-2011.0040, 8/13/14; 40 CFR 52.21]

- 3.4 The permittee shall monitor and record the daily and annual beet throughput to the facility to demonstrate compliance with throughput limits (Permit Conditions 3.2 – 3.3). Annual throughput shall be determined by summing each daily throughput monthly, and then summing each monthly throughput for the campaign year. A compilation of the most recent two campaign years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

[P-2011.0040, 8/13/14]

Boiler Steam Production

- 3.5 Prior to September 30, 2016 (i.e., the end of the 2015 campaign year), total steam production in the B&W Boiler, the Erie City Boiler, and the Nebraska Boiler (combined) shall not exceed 2,050,000 thousand pounds of steam per campaign year (klb/yr). After September 30, 2016, this limit shall no longer be applicable.

[P-2011.0040, 8/13/14; 40 CFR 52.21]

- 3.6 The permittee shall monitor and record the monthly and annual boiler steam production to demonstrate compliance with Permit Condition 3.5. Annual steam production shall be determined by summing each monthly steam production in the boilers for the campaign year. A compilation of the most recent two campaign years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

[P-2011.0040, 8/13/14]

Boiler Fuel Usage & Conversion

- 3.7 The permittee shall comply with the following:

- Total coal usage in the B&W Boiler and the Erie City Boiler (combined) shall not exceed 104,900 tons of coal per campaign year (T/yr).
- On and after January 31, 2016, the B&W Boiler, the Erie City Boiler, and the Nebraska Boiler shall combust natural gas only.
- On or before January 31, 2016, the boiler coal burners and boiler coal delivery systems in the B&W Boiler and in the Erie City Boiler shall be permanently removed so that the boilers are no longer capable of accommodating coal combustion.

[P-2011.0040, 8/13/14; 40 CFR 52.21]

3.8 The permittee shall monitor and record the monthly and annual boiler coal usage to demonstrate compliance with fuel usage limits (Permit Condition 3.7). Annual coal usage shall be determined by summing each monthly coal usage in the boilers for the campaign year. A compilation of the most recent two campaign years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

[P-2011.0040, 8/13/14; IDAPA 58.01.01.322.06-07, 5/1/94]

3.9 On or before January 31, 2016, the permittee shall provide written notification to DEQ of the actual date of permanent removal of the boiler coal burners and boiler coal delivery systems (as required by Permit Condition 3.7).

- The notification shall include a description of the method(s) used to ensure that the boilers are no longer capable of accommodating coal combustion.

[P-2011.0040, 8/13/14; IDAPA 58.01.01.322.08, 5/1/94]

Boiler MACT

3.10 40 CFR 63, Subparts A and DDDDD

The permittee shall comply with the applicable requirements of 40 CFR 63, Subparts A and DDDDD (Permit Condition 3.47), no later than January 31, 2016, in accordance with 40 CFR 63, Subpart DDDDD and 40 CFR 63.7495(b).

[P-2011.0040, 8/13/14; 40 CFR 63, Subparts A and DDDDD]

3.11 40 CFR 63, Subparts A and DDDDD

The permittee shall meet the notification requirements in 40 CFR 63.7545 and Subpart A according to the schedule in 40 CFR 63.7545 and 40 CFR 63, Subpart A (Permit Condition 3.47), in accordance with 40 CFR 63, Subpart A and 40 CFR 63.7495(d).

[P-2011.0040, 8/13/14; 40 CFR 63, Subparts A and DDDDD]

PSD 40 CFR 52.21 – Annual Emissions Monitoring

3.12 The permittee shall monitor the facility-wide emissions of PM, PM₁₀, PM_{2.5}, SO₂, NO_x, and CO each calendar year through calendar year 2016, in accordance with 40 CFR 52.21(r)(6). Records of annual emissions shall be calculated and maintained in tons per year on a calendar year basis.

[P-2011.0040, 8/13/14; 40 CFR 52.21(r)(6)(iii)]

3.13 The permittee shall submit a report to DEQ if facility-wide annual emissions of PM, PM₁₀, PM_{2.5}, SO₂, NO_x, or CO exceed baseline actual emissions by a significant amount, and if such emissions differ from the preconstruction projection as determined in accordance with 40 CFR 52.21(r)(6)(v). The report shall be submitted to DEQ within 60 days after the end of such year and shall contain the following:

- The name, address and telephone number of the major stationary source;
- The annual emissions as calculated pursuant to 40 CFR 52.21(r)(6)(iii); and
- Any other information that the permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

[P-2011.0040, 8/13/14; 40 CFR 52.21(r)(6)(v)]

3.14 The permittee shall not use any NSR pollutant emission decreases that result from (or are projected to result from) the conversion of facility boilers to natural gas-firing for the purposes of emissions netting calculations under the PSD program.

- NSR emission decreases from the conversion of facility boilers to natural gas-firing only are not creditable for the purposes of calculating NSR pollutant net emissions increases under 40 CFR 52.21(b)(3). These emission decreases shall be excluded from the net emissions increase calculation, notwithstanding whether such emission decreases are treated as a particular change or as a contemporaneous change.

[P-2011.0040, 8/13/14; 40 CFR 52.21]

Air Pollution Emergency

3.15 The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550-562.

[P-2011.0040, 8/13/14; IDAPA 58.01.01.550-562, 4/11/06]

Fugitive Dust

3.16 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
- Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust;
- Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
- Paving of roadways and their maintenance in a clean condition, where practical; or
- Prompt removal of earth or other stored material from streets, where practical.

[P-2010.0043, 3/18/14; P-2011.0040, 8/13/14; IDAPA 58.01.01.650-651, 3/30/07]

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

[P-2010.0043, 3/18/14; IDAPA 58.01.01.322.06-07, 5/1/94]

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

[P-2010.0043, 3/18/14; IDAPA 58.01.01.322.07, 5/1/94]

3.19 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of

the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[P-2010.0043, 3/18/14; P-2011.0040, 8/13/14; IDAPA 58.01.01.322.06-07, 5/1/94]

Odors

3.20 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, in accordance with IDAPA 58.01.01.776.01.
[P-2010.0043, 3/18/14; IDAPA 58.01.01.775-776 (state only), 5/1/94]

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

[P-2010.0043, 3/18/14; IDAPA 58.01.01.322.07 (state only), 5/1/94]

Visible Emissions

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

[P-2010.0043, 3/18/14; P-2011.0040, 8/13/14; IDAPA 58.01.01.625, 5/8/09]

3.23 Unless otherwise specified in this permit (Permit Conditions 4.3 and 5.4), the permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

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

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130-136 (Permit Conditions 3.25 through 3.29, and 12.22).

[P-2010.0043, 3/18/14; IDAPA 58.01.01.322.06-08, 5/1/94]

3.24 The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[P-2010.0043, 3/18/14; IDAPA 58.01.01.322.07, 5/1/94]

Excess Emissions

Excess Emissions - General

- 3.25** 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 (Permit Conditions 3.25 through 3.29) and the regulations of IDAPA 58.01.01.130-136.

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

[IDAPA 58.01.01.132, 4/5/00]

Excess Emissions - Startup, Shutdown, Scheduled Maintenance

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

- Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ within an area designated by DEQ as a PM₁₀ nonattainment area, unless the permittee demonstrates that such is reasonably necessary to facility operations and cannot be reasonably avoided and DEQ approves such activity in advance, to the extent advance approval by DEQ is feasible. This prohibition on scheduled startup, shutdown or maintenance activities during Advisories does not apply to situations where shutdown is necessitated by urgent situations, such as imminent equipment failure, power curtailment, worker safety concerns or similar situations.
- Notifying DEQ of an anticipated excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the permittee demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
- Reporting and recording the information required pursuant to the excess emissions reporting and recordkeeping requirements (Permit Conditions 3.28 and 3.29) and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133, 4/11/06]

Excess Emissions - Upset, Breakdown, or Safety Measures

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

- Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
- Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
- Report and record the information required pursuant to the excess emissions reporting and recordkeeping requirements (Permit Conditions 3.28 and 3.29) and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

- During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

[IDAPA 58.01.01.134, 4/11/06]

Excess Emissions – Reporting and Recordkeeping

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

[IDAPA 58.01.01.135, 4/11/06]

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

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

[IDAPA 58.01.01.136, 4/5/00]

Sulfur Content

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

- 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; 40 CFR 52.21]

- 3.31** For each shipment of fuel received, the permittee shall either obtain samples and a laboratory analysis, or obtain and maintain at the facility fuel receipts from the fuel supplier, which demonstrate the type of fuel in each shipment and that each shipment received complies with the fuel sulfur content limits specified in the fuel sulfur content permit condition (Permit Condition 3.30).

[P-2010.0043, 3/18/14; IDAPA 58.01.01.322.07, 5/1/94]

Open Burning

- 3.32** 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]

Asbestos

- 3.33** NESHAP 40 CFR 61, Subpart M - National Emission Standard for Asbestos

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

[40 CFR 61, Subpart M]

Recycling and Emissions Reductions

3.34 40 CFR Part 82 - Protection of Stratospheric Ozone

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

Accidental Release Prevention

3.35 For stationary sources that have more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, the permittee 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 upon 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)]

Operation and Maintenance

3.36 The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[40 CFR 64.6(c)(1)(ii); IDAPA 58.01.01.322.06, 5/1/94]

3.37 The permittee shall maintain an operation and maintenance (O&M) manual for control equipment and for monitoring equipment relevant to the following sources: (a) the B&W Boiler, (b) the Erie City Boiler, (c) the pulp dryers, (d) the pellet coolers, and (e) the kiln. Any changes to the O&M manual shall be submitted to DEQ at the address provided (Permit Condition 3.46) for review and comment, within 15 days of the change.

[P-2010.0043, 3/18/14; IDAPA 58.01.01.322.06, 5/1/94]

3.38 The O&M manual shall be a permittee developed document based upon, but independent from, the manufacturer supplied operating manual(s). The O&M manuals shall include, at a minimum:

- a general description of the control equipment;
- procedures that will be followed to ensure compliance with emission limits (Permit Conditions 3.22 through 3.24, 4.1, 5.1, 7.1, 8.1, and 9.1 through 9.3), the control equipment maintenance and operation general provision (Permit Condition 3.36), and the manufacturer's specifications;
- schedule and procedures for corrective action that will be taken if visible emissions are present from the control equipment at any time, including procedures to determine whether bags or cartridges are ruptured, and procedures to determine if bags or cartridges are not appropriately secured in place;
- unless otherwise specified in this permit, a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges where applicable, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, any specific control device monitoring parameter(s) required under any permit condition in this permit, unless DEQ approves their removal from this permit condition. The control device monitoring program shall be developed by the permittee based on performance test results, vendor data, and/or other supporting documentation. Whenever an operating parameter is outside the operating range specified by a control device monitoring program, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards, unless DEQ determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required.

- procedures for periodic calibration of each water flow meter and each pressure gauge (including manometers) on at least an annual basis and to an accuracy of within $\pm 5\%$ of span, or on a frequency and to an accuracy as specified by the manufacturer.
- the recommended minimum value that shall be maintained for the water flow rate to the gas washer for the kiln (Permit Condition 9.5);
- the recommended minimum value that shall be maintained for the pressure drop across the gas washer for the kiln (Permit Condition 9.6);
- procedures for normal operating conditions, startup, shutdown, and maintenance;
- procedures for upset conditions and corrective actions to be taken;
- methods of preventing malfunctions;
- quality assurance and quality control (QA/QC) practices to ensure data validity for each water flow meter and each pressure gauge. QA/QC practices shall comply with manufacturer's recommendations or as otherwise approved by DEQ.
- in the event that a monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.
- provisions for annual inspections during planned maintenance outages.

[P-2010.0043, 3/18/14; IDAPA 58.01.01.322.06-07, 5/1/94]

- 3.39** The permittee shall calibrate, maintain and operate control equipment in accordance with the O&M manual. The procedures specified in the O&M manual are incorporated by reference into this permit and are enforceable permit conditions. The O&M manual and copies of any manufacturer's manual(s) and recommendations shall be maintained onsite and shall be made available to DEQ representatives upon request. The permittee shall keep records of inspection and maintenance activities for a period of five years, in accordance with the monitoring and recordkeeping facility-wide condition (Permit Condition 3.45).

[P-2010.0043, 3/18/14; IDAPA 58.01.01.322.06-07, 5/1/94]

Performance Testing

- 3.40** If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

[IDAPA 58.01.01.157, 4/5/00]

- 3.41** All performance 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, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

[IDAPA 58.01.01.157, 4/5/00]

- 3.42** Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

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

Table 3.2 EPA REFERENCE TEST METHODS

Pollutant	Test Method ^(a)	Special Conditions
PM ₁₀	EPA Methods 201A ^(b) / 202	Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
PM	EPA Method 5	
	EPA Method 5B	For B&W Boiler and Erie City Boiler, when fired by coal
NO _x	EPA Method 7	
SO ₂	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	For an NSPS source, use IDAPA 58.01.01.625 and Method 9. For other sources, use IDAPA 58.01.01.625 only.
Sulfur content	ASTM Method D3177-75 or D4239-85	Sulfur content of coal and coke fuels.

- a) Or a DEQ-approved alternative in accordance with IDAPA 58.01.01.157.
b) EPA Method 201A is not applicable for wet scrubber controlled sources.

[P-2010.0043, 3/18/14; IDAPA 58.01.01.322.09, 5/1/94]

3.44 Unless a longer time is approved by DEQ, the permittee shall submit a compliance test report for the respective test to DEQ within 60 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the reports and certifications facility-wide condition (Permit Condition 3.46).

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.09, 5/1/94]

Monitoring and Recordkeeping

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

[IDAPA 58.01.01.322.07, 5/1/94]

Reports and Certifications

3.46 All periodic reports and certifications required by this permit shall be submitted to DEQ within 45 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office
650 Addison Avenue West, Suite 110
Twin Falls, ID 83301
Phone: (208) 736-2190 Fax: (208) 736-2194

The periodic compliance certification required in the general provisions (General Provision 12.22) shall also be submitted within 45 days of the end of the specified reporting period to:

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

[P-2010.0043, 3/18/14; IDAPA 58.01.01.322.08, 11, 4/5/00]

Incorporation of Federal Requirements by Reference

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

- Applicable requirements of Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60, including Subparts A and Db.
- Applicable requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61
- Applicable requirements of National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63, including Subparts A and DDDDD.
- Applicable requirements of Compliance Assurance Monitoring (CAM), 40 CFR Part 64
- Applicable requirements of Protection of Stratospheric Ozone, 40 CFR Part 82
- Applicable requirements of Approval and Promulgation of Implementation Plans – Prevention of Significant Deterioration (PSD), 40 CFR Part 52

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

[P-2011.0040, 8/13/14; IDAPA 58.01.01.107, 4/7/11; IDAPA 58.01.01.205, 4/2/08]

4. B&W BOILER

Summary Description

This section provides a summary description of the Babcock & Wilcox Boiler (B&W Boiler), and has been provided for informational purposes.

With a maximum operational capacity of 175,000 pounds of steam per hour, the B&W Boiler is a coal-fired stoker boiler that is used to provide steam for beet processing and electricity generation.

Table 4.1 describes the device used to control emissions from the B&W Boiler.

Table 4.1 EMISSIONS UNITS AND CONTROL EQUIPMENT

Emissions Unit	Control Equipment (Emission Point ID No.)
B&W Boiler (S-B1)	Multiclone (A-B1A) and Spray-Chamber Scrubber (A-B1B) in series

Table 4.2 contains a summary of requirements that apply generally to the B&W Boiler. Specific permit requirements are listed below Table 4.2.

Table 4.2 APPLICABLE REQUIREMENTS SUMMARY

Parameters	Permit Conditions	Limits/Standards	Applicable Requirement References	Operating, Monitoring, and Recordkeeping Requirements
Visible emissions	3.22	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.23-3.24, 4.8, 3.45-3.46
PM (water flow rate, opacity, total solids)	4.1	Coal ^(a) 0.100 gr/dscf at 8% O ₂ ----- Natural gas only 0.015 gr/dscf at 3% O ₂	IDAPA 58.01.01.676-677 40 CFR 64	4.2-4.7, 4.8, 3.45-3.46
Boiler Steam Production	3.5-3.6	2,050,000 klb/yr (combined) ^(a)	P-2011.0040	3.6, 3.45-3.46
Boiler Fuel Usage & Conversion	3.7 - 3.9	Natural gas or coal ^(a)	P-2011.0040 IDAPA 58.01.01.322 40 CFR 52.21	3.45-3.46
Boiler MACT	3.10-3.11	Compliance with NESHAP 40 CFR 63, Subparts A and DDDDD	P-2011.0040 40 CFR 63, Subparts A and DDDDD	3.10-3.11, 3.45-3.46, 3.47
Sulfur Content	3.30-3.31	1% sulfur by weight for coal, as received	IDAPA 58.01.01.725 40 CFR 52.21	3.31, 3.45-3.46
Operation and Maintenance	3.36-3.39	Compliance with O&M requirements	IDAPA 58.01.01.322	3.37-3.39, 3.45-3.46
Performance Testing	4.8-4.9	Once every 3 years for PM Initial test only for CO	IDAPA 58.01.01.322 IDAPA 58.01.01.211	4.8-4.9, 3.40-3.44, 3.45-3.46

a) Steam production limit is a combined limit for all facility boilers. Boilers will be limited to natural gas-firing only on the compliance date specified in Permit Condition 3.7.

Emission Limits

4.1 The permittee shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979 or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of the concentrations shown in Table 4.3. The effluent gas volume shall be corrected to the oxygen concentration shown.

- The B&W Boiler is fuel-burning equipment as defined in IDAPA 58.01.01.006.

Table 4.3 FUEL-BURNING EQUIPMENT GRAIN-LOADING STANDARDS

Fuel Type	Allowable Particulate Emissions (gr/dscf)	Oxygen
Coal	0.100 gr/dscf	8%
Natural gas only	0.015 gr/dscf	3%

[IDAPA 58.01.01.677, 5/1/94]

Compliance Assurance Monitoring - 40 CFR 64

4.2 CAM 40 CFR 64 - Approved Monitoring

- When the B&W Boiler is fired with coal, the permittee shall comply with the approved monitoring requirements for the B&W Boiler specified in Table 4.4.

Table 4.4 CAM REQUIREMENTS SUMMARY

Control Device	Pollutant	Limit ^(a)	Indicator	Monitoring Approach	Indicator Range (Monitoring Frequency)
Spray-Chamber Scrubber (A-B1B)	PM	0.100 gr/dscf at 8% O ₂	Water Flow Rate	Flow Meter	280-690 gpm (daily average of 15-minute readings)
			Opacity	Method 9	≤ 15% (weekly reading of 6-minute average)
			Total Solids	Sampling Scrubber Water at Inlet	≤ 142,000 mg/L (monthly sampling Sept to Dec; bi-weekly sampling Jan to campaign end)

a) Emission limits are provided in Permit Condition 4.1.

- An excursion is any of the following:
 - Any day in which the scrubber water flow rate (daily average) is below 280 gallons per minute.
 - Any day in which the scrubber water flow rate (daily average) exceeds 690 gallons per minute.
 - Any 6-minute period in which opacity emissions (6-minute average) from the B&W Boiler stack exceeds 15%.
 - Any sample from the B&W Boiler Spray-Chamber Scrubber (A-B1B) water in which the total solids measurement exceeds 142,000 milligrams per liter.

[40 CFR 64.6(c)(2)]

4.3 CAM 40 CFR 64 - Performance Criteria

- Water Flow Rate*

Each day the B&W Boiler is fired with coal:

- At a minimum on a 15-minute basis the scrubber water flow rate shall be measured and recorded.
- At a minimum on a day-ending ("daily") basis, the daily average scrubber water flow rate shall be calculated and recorded. Each daily average scrubber water flow rate shall be calculated as the arithmetic average of all 15-minute scrubber water flow rate measurements for the scrubber in a given day.

- The permittee shall use the results of each daily average scrubber water flow rate calculation to assess excursions as defined in the approved monitoring (Permit Condition 4.2).
- *Opacity*
 - At a minimum each week in which coal is combusted in the B&W Boiler, the permittee shall conduct a visible emissions inspection following the procedures in the facility-wide visible emissions monitoring requirement (Permit Condition 3.22). If any level of visible emissions is present, a certified visible emissions reader shall perform a visible emissions reading in accordance with the procedures contained in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded. If visible emissions are not present, the permittee shall observe the emissions point for at least six minutes to document that there are no visible emissions. The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted, as required in the visible emissions recordkeeping requirement (Permit Condition 3.24).
 - The permittee shall use the results of each visible emission inspection to assess excursions (and excess emissions, if applicable) as defined in the approved monitoring (Permit Condition 4.2).
- *Total Solids*

Each day the B&W Boiler is fired with coal:

 - At a minimum on a monthly basis from September to December, the permittee shall collect a representative sample of water from the Spray-Chamber Scrubber (A-B1B).
 - At a minimum on a bi-weekly basis from January until the end of each campaign, the permittee shall collect a representative sample of water from the Spray-Chamber Scrubber (A-B1B).
 - The concentration of total dissolved solids and suspended solids in each sample of water shall be analyzed and recorded.
 - The permittee shall use each measurement of total solids to assess excursions as defined in the approved monitoring (Permit Condition 4.2).

[40 CFR 64.3(b)(4); 40 CFR 64.6(c)]

4.4 **CAM 40 CFR 64 - Operation of Approved Monitoring**

- The permittee shall conduct the approved monitoring (Permit Condition 4.2) upon issuance of this permit.
- At all times when the B&W Boiler is fired with coal, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the B&W Boiler is fired with coal. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for the purposes of CAM, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- Upon detecting an excursion or exceedance when the B&W Boiler is fired with coal, the permittee shall restore operation of the B&W Boiler (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing

the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- When the B&W Boiler is fired with coal, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify DEQ and, if necessary, submit a proposed modification to this operating permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7]

4.5 CAM 40 CFR 64 - Quality Assurance and Control Practices

The permittee shall develop and maintain a quality assurance and control practices (QA/QC) plan for the scrubber water flow meter adequate to ensure the continuing validity of the data when the B&W Boiler is fired with coal. The permittee shall consider manufacturer recommendations in developing appropriate quality assurance and control practices. QA/QC plans shall be incorporated as part of the O&M manual (Permit Condition 3.38). This permit condition is no longer applicable after January 31, 2016.

[40 CFR 64.3(b)(3); 40 CFR 64.6(c)]

4.6 CAM 40 CFR 64 - Reporting and Recordkeeping

- The reports required by the semiannual monitoring reports and reporting deviations and excess emissions general provisions (Permit Conditions 12.25 and 12.26) shall include the following information:
 - Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).
- The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under CAM (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Records shall be maintained in accordance with the monitoring and recordkeeping facility-wide condition (Permit Condition 3.45).
- This permit condition is no longer applicable after January 31, 2016.

[40 CFR 64.9(a), (b)(1)]

4.7 CAM 40 CFR 64 - Quality Improvement Plan

The permittee shall develop and implement a quality improvement plan (QIP) in accordance with 40 CFR 64.8 if an accumulation of exceedances or excursions exceeds 5 percent duration of the B&W Boiler's operating time for a reporting period. This permit condition is no longer applicable after January 31, 2016.

[40 CFR 64.8(a)]

Performance Testing

4.8 A compliance test shall be conducted within one year of permit issuance, and shall be conducted at least once every three years, to demonstrate compliance with Permit Condition 4.1. Testing shall be conducted and results reported in accordance with IDAPA 58.01.01.157 and the performance testing facility-wide permit conditions (Permit Condition 3.40 through 3.44), and records shall be maintained in accordance with the monitoring and recordkeeping permit condition (Permit Condition 3.45).

- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5B, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157. Test methods and procedures shall comply with IDAPA 58.01.01.157.
- Prior to conducting the test, the permittee shall address the required averaging period in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.
- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the steam production rate of the boiler, coal feed rate in tons per hour, and water flow rate to the scrubber (A–B1B) during each test.
- For the coal used during the source test, the permittee shall record the high heating value and analysis results, including ash content.
- The permittee shall collect a representative sample of water from the scrubber (A–B1B) during each test. The concentration of total dissolved solids and suspended solids in the sample water shall be analyzed and recorded, and expressed in milligrams of solids per liter of water.

[IDAPA 58.01.01.322.06-09, 5/1/94]

4.9 On or before July 29, 2016, a performance test shall be conducted on the B&W Boiler stack to measure CO emissions, in accordance with IDAPA 58.01.01.211 and IDAPA 58.01.01.157.

- CO emissions during the test shall be determined and reported in CO concentration (in ppm), CO emission factor (in lb CO/1000 lb steam), and CO emission rate (lb/hr).
- The average boiler steaming rate (lb steam/hr) during the test shall be measured and reported.
- The B&W Boiler shall be operated at maximum capacity (at least 80% of the maximum heat input capacity or greater) during the test, unless otherwise approved by DEQ.
- The permittee is encouraged to submit a performance test protocol prior to testing, and the permittee shall furnish DEQ a written report of the results of the performance test, in accordance with performance testing requirements (Permit Conditions 3.40 – 3.44).

[P-2011.0040, 8/13/14; IDAPA 58.01.01.211.04]

5. ERIE CITY BOILER

Summary Description

This section provides a summary description of the Erie City Boiler, and has been provided for informational purposes.

With a maximum operational capacity of 250,000 pounds of steam per hour when fired with natural gas and 220,000 pounds of steam per hour when fired with coal, the Erie City Boiler is a coal pulverized/natural gas-fired, horizontally-fired boiler that is used to provide steam for beet processing and electricity generation.

Table 5.1 describes the device used to control emissions from the Erie City Boiler.

Table 5.1 EMISSIONS UNITS AND CONTROL EQUIPMENT

Emissions Unit	Control Equipment (Emission Point ID No.)
Erie City Boiler (S-B2)	Coal and natural gas Multiclone (A-B2A) and Spray-Chamber Scrubber (A-B2B) in series
	Natural gas only Multiclone (A-B2A)

Table 5.2 contains a summary of requirements that apply generally to the Erie City Boiler. Specific permit requirements are listed below Table 5.2.

Table 5.2 APPLICABLE REQUIREMENTS SUMMARY

Parameters	Permit Conditions	Limits/Standards	Applicable Requirement References	Operating, Monitoring, and Recordkeeping Requirements
Visible emissions	3.22	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.23-3.24, 5.9, 3.45-3.46
PM (water flow rate, opacity, total solids when firing coal)	5.1	Coal and natural gas ^(a) (0.100 * X + 0.011 * Y) gr/dscf at 8% O ₂ ----- Natural gas only 0.015 gr/dscf at 3% O ₂	IDAPA 58.01.01.676-677 40 CFR 64	5.2-5.8, 5.9, 3.45-3.46
Boiler Steam Production	3.5-3.6	2,050,000 klb/yr (combined) ^(b)	P-2011.0040	3.6, 3.45-3.46
Boiler Fuel Usage & Conversion	3.7 - 3.9	Natural gas and/or coal ^(b)	P-2011.0040 IDAPA 58.01.01.322 40 CFR 52.21	3.45-3.46
Boiler MACT	3.10-3.11	Compliance with NESHAP 40 CFR 63, Subparts A and DDDDD	P-2011.0040 40 CFR 63, Subparts A and DDDDD	3.10-3.11, 3.45-3.46, 3.47
Sulfur Content	3.30-3.31	1% sulfur by weight for coal, as received	IDAPA 58.01.01.725 40 CFR 52.21	3.31, 3.45-3.46
Operation and Maintenance	3.36-3.39	Compliance with O&M requirements	IDAPA 58.01.01.322	3.37-3.39, 3.45-3.46
Performance Testing	5.9	Within 1 year or within 30 days of firing coal	IDAPA 58.01.01.322	5.9, 3.40-3.44, 3.45-3.46

- a) X is the percentage of total heating input derived from the combustion of coal; Y is the percentage of total heating input derived from the combustion of natural gas.
- b) Steam production limit is a combined limit for all facility boilers. Boilers will be limited to natural gas-firing only on the compliance date specified in Permit Condition 3.7.

Emission Limits

5.1 The permittee shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979 or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of the concentrations shown in Table 5.3. The effluent gas volume shall be corrected to the oxygen concentration shown. When two or more types of fuel are burned concurrently, the allowable emissions shall be determined by proportioning the gross heat input and emission standards for each fuel.

- The Erie City Boiler is fuel-burning equipment as defined in IDAPA 58.01.01.006.

Table 5.3 FUEL-BURNING EQUIPMENT GRAIN-LOADING STANDARDS

Fuel Type	Allowable Particulate Emissions (gr/dscf)	Oxygen
Coal, or the combination of coal and natural gas	$(0.100 * X + 0.011 * Y)$ gr/dscf ^(a)	8%
Natural gas only	0.015 gr/dscf	3%

a) X is the percentage of total heating input derived from the combustion of coal; Y is the percentage of total heating input derived from the combustion of natural gas

[IDAPA 58.01.01.677, 5/1/94]

Monitoring and Recordkeeping

5.2 The permittee shall monitor and record the boiler fuel type whenever the fuel type is changed. The records shall be maintained in accordance with the monitoring and recordkeeping facility-wide condition (Permit Condition 3.45). Fuel type in this section means natural gas only, coal only, or the combination of natural gas and coal.

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

Compliance Assurance Monitoring - 40 CFR 64

5.3 CAM 40 CFR 64 - Approved Monitoring

- When the Erie City Boiler is fired with coal, the permittee shall comply with the approved monitoring requirements for the Erie City Boiler specified in Table 5.4.

Table 5.4 CAM REQUIREMENTS SUMMARY

Control Device	Pollutant	Limit ^(a)	Indicator	Monitoring Approach	Indicator Range (Monitoring Frequency)
Spray-Chamber Scrubber (A-B2B)	PM	<u>Coal and natural gas</u> $(0.100 * X + 0.011 * Y)$ gr/dscf at 8% O ₂	Water Flow Rate	Flow meter	660-1200 gpm (daily average of 15-minute readings)
			Opacity	Method 9	≤ 15% (weekly reading of 6-minute average)
		<u>Natural gas only</u> 0.015 gr/dscf at 3% O ₂	Total Solids	Sampling Scrubber Water at Inlet	≤ 142,000 mg/L (monthly sampling Sept to Dec; bi-weekly sampling Jan to campaign end)

a) Emission limits are provided in Permit Condition 5.1.

- An excursion is any of the following:
 - Any day in which the scrubber water flow rate (daily average) is below 660 gallons per minute.
 - Any day in which the scrubber water flow rate (daily average) exceeds 1200 gallons per minute.
 - Any 6-minute period in which opacity emissions (6-minute average) from the Erie City Boiler stack exceed 15%.
 - Any sample from the Erie City Boiler Spray-Chamber Scrubber (A-B2B) in which the total solids content exceeds 142,000 milligrams per liter.

[40 CFR 64.6(c)(2)]

5.4 CAM 40 CFR 64 - Performance Criteria

- *Water Flow Rate*

Each day the Erie City Boiler is fired with coal:

- At a minimum on a 15-minute basis the scrubber water flow rate shall be measured and recorded.
- At a minimum on a day-ending (“daily”) basis, the daily average scrubber water flow rate shall be calculated and recorded. Each daily average scrubber water flow rate shall be calculated as the arithmetic average of all 15-minute scrubber water flow rate measurements for the scrubber in a given day.
- The permittee shall use the results of each daily average scrubber water flow rate calculation to assess excursions as defined in the approved monitoring (Permit Condition 5.3).

- *Opacity*

- At a minimum each week in which coal is combusted in the Erie City Boiler, the permittee shall conduct a visible emissions inspection following the procedures in the facility-wide visible emissions monitoring requirement (Permit Condition 3.22). If any level of visible emissions is present, a certified visible emissions reader shall perform a visible emissions reading in accordance with the procedures contained in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded. If visible emissions are not present, the permittee shall observe the emissions point for at least six minutes to document that there are no visible emissions. The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted, as required in the visible emissions recordkeeping requirement (Permit Condition 3.24).
- The permittee shall use the results of each visible emission inspection to assess excursions (and excess emissions, if applicable) as defined in the approved monitoring (Permit Condition 5.3).

- *Total Solids*

Each day the Erie City Boiler is fired with coal:

- At a minimum on a monthly basis from September to December, the permittee shall collect a representative sample of water from the Spray-Chamber Scrubber (A–B2B).
- At a minimum on a bi-weekly basis from January until the end of each campaign, the permittee shall collect a representative sample of water from the Spray-Chamber Scrubber (A–B2B).
- The concentration of total dissolved solids and suspended solids in each sample of water shall be analyzed and recorded.
- The permittee shall use each measurement of total solids to assess excursions as defined in the approved monitoring (Permit Condition 5.3).

[40 CFR 64.3(b)(4); 40 CFR 64.6(c)]

5.5 CAM 40 CFR 64 - Operation of Approved Monitoring

- The permittee shall conduct the approved monitoring (Permit Condition 5.3) upon issuance of this permit.
- At all times when the Erie City Boiler is fired with coal, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the Erie City Boiler is fired with coal. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall

not be used for the purposes of CAM, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

- Upon detecting an excursion or exceedance when the Erie City Boiler is fired with coal, the permittee shall restore operation of the Erie City Boiler (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- When the Erie City Boiler is fired with coal, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify DEQ and, if necessary, submit a proposed modification to this operating permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7]

5.6 CAM 40 CFR 64 - Quality Assurance and Control Practices

The permittee shall develop and maintain a quality assurance and control practices (QA/QC) plan for the scrubber water flow meter adequate to ensure the continuing validity of the data when the Erie City Boiler is fired with coal. The permittee shall consider manufacturer recommendations in developing appropriate quality assurance and control practices. QA/QC plans shall be incorporated as part of the O&M manual (Permit Condition 3.38). This permit condition is no longer applicable after January 31, 2016.

[40 CFR 64.3(b)(3); 40 CFR 64.6(c)]

5.7 CAM 40 CFR 64 - Reporting and Recordkeeping

- The reports required by the semiannual monitoring reports and reporting deviations and excess emissions general provisions (Permit Conditions 12.25 and 12.26) shall include the following information:
 - Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).
- The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under CAM (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Records shall be maintained in accordance with the monitoring and recordkeeping facility-wide condition (Permit Condition 3.45).

- This permit condition is no longer applicable after January 31, 2016.

[40 CFR 64.9(a), (b)(1)]

5.8 CAM 40 CFR 64 - Quality Improvement Plan

The permittee shall develop and implement a quality improvement plan (QIP) in accordance with 40 CFR 64.8 if an accumulation of exceedances or excursions exceeds 5 percent duration of the Erie City Boiler's operating time for a reporting period. This permit condition is no longer applicable after January 31, 2016.

[40 CFR 64.8(a)]

Performance Testing

5.9 A compliance test shall be conducted within one year of permit issuance, or within 30 days following coal firing, whichever is later, to demonstrate compliance with Permit Condition 5.1. Testing shall be conducted and results reported in accordance with IDAPA 58.01.01.157 and the performance testing facility-wide permit conditions (Permit Condition 3.40 through 3.44), and records shall be maintained in accordance with the monitoring and recordkeeping permit condition (Permit Condition 3.45).

- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5B, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157. Test methods and procedures shall comply with IDAPA 58.01.01.157.
- Prior to conducting the test, the permittee shall address the required averaging period in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.
- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the steam production rate of the boiler, coal feed rate in tons per hour, natural gas burned in scf, and water flow rate to the scrubber (A-B2B) during each test.
- For the coal used during the source test, the permittee shall record the high heating value and analysis results, including ash content.
- The permittee shall collect a representative sample of water from the scrubber (A-B2B) during each test. The concentration of total dissolved solids and suspended solids in the sample water shall be analyzed and recorded, and expressed in milligrams of solids per liter of water.

[IDAPA 58.01.01.322.06-09, 5/1/94]

6. NEBRASKA BOILER

Summary Description

This section provides a summary description of the Nebraska Boiler, and has been provided for informational purposes.

The Nebraska Boiler has a maximum operational capacity of 200,000 pounds of steam per hour. The Nebraska Boiler is a natural gas-fired back up boiler, and is used to provide steam for beet processing and electricity generation.

Table 6.1 describes the device used to control emissions from the Nebraska Boiler.

Table 6.1 EMISSIONS UNITS AND CONTROL EQUIPMENT

Emissions Unit	Control Equipment (Emission Point ID No.)
Nebraska Boiler (S-B3)	None

Table 6.2 contains a summary of requirements that apply generally to the Nebraska Boiler. Specific permit requirements are listed below Table 6.2.

Table 6.2 APPLICABLE REQUIREMENTS SUMMARY

Parameters	Permit Conditions	Limits/Standards	Applicable Requirement References	Operating, Monitoring, and Recordkeeping Requirements
Visible emissions	6.1, 3.22	20% opacity for no more than 3 minutes in any 60-minute period	P-050406 IDAPA 58.01.01.625	3.23-3.24, 3.45-3.46
PM	6.2	0.015 gr/dscf at 3% O ₂	P-050406 IDAPA 58.01.01.676	6.4-6.9, 3.45-3.46
NO _x	6.3	17.52 T/yr	P-050406	6.8, 3.45-3.46
Boiler Steam Production	3.5-3.6	2,050,000 klb/yr (combined) ^(a)	P-2011.0040	3.6, 3.45-3.46
Boiler Fuel Usage & Conversion	3.7 - 3.9, 6.4-6.5	Natural gas only	P-050406 P-2011.0040 IDAPA 58.01.01.322 40 CFR 52.21	6.8, 3.45-3.46
Boiler MACT	3.10-3.11	Compliance with NESHAP 40 CFR 63, Subparts A and DDDDD	P-2011.0040 40 CFR 63, Subparts A and DDDDD	3.10-3.11, 3.45-3.46, 3.47
Operating time	6.6-6.7	10% annual capacity	40 CFR 60.49b(d)	6.9, 3.45-3.46
		Backup only	P-050406	

a) Steam production limit is a combined limit for all facility boilers. Boilers will be limited to natural gas-firing only on the compliance date specified in Permit Condition 3.7.

Emission Limits

- 6.1 Emissions from the backup boiler stack, or any other stack, vent, or functionally equivalent opening associated with the backup boiler, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.
[P-050406, 7/27/05; IDAPA 58.01.01.625, 5/8/09]
- 6.2 In accordance with IDAPA 58.01.01.676, PM emissions from the backup boiler stack shall not exceed 0.015 gr/dscf corrected to 3% oxygen when burning gas.
[P-050406, 7/27/05; IDAPA 58.01.01.676, 5/1/94]
- 6.3 The NO_x emissions from the backup boiler stack shall not exceed 17.52 tons per any consecutive 12-month period.
[P-050406, 7/27/05]

Operating Requirements

- 6.4 The backup boiler shall burn natural gas exclusively.
[P-050406, 7/27/05]
- 6.5 The maximum heat input capacity of the backup boiler shall not exceed 250 MMBtu/hr.
[P-050406, 7/27/05]
- 6.6 The annual capacity of the backup boiler shall be limited to 10%.
[P-050406, 7/27/05]
- 6.7 The backup boiler shall be used only if either the B&W Boiler or the Erie City Boiler become partially or completely inoperable.
[P-050406, 7/27/05]

Monitoring and Recordkeeping

- 6.8 In accordance with 40 CFR 60.49b(d), the permittee shall record and maintain records of the amount of natural gas combusted each day.
[P-050406, 7/27/05; 40 CFR 60.49b(d)]
- 6.9 In accordance with 40 CFR 60.49b(d), the permittee shall calculate the annual capacity factor for natural gas each calendar month in order to demonstrate compliance with Permit Condition 6.6. The annual capacity factor shall be determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Annual capacity factor shall be calculated as follows:
- $$\text{Annual Capacity Factor} = \frac{\text{Actual Heat Input for the Previous 12 - Month Period (MMBtu)}}{250 \text{ MMBtu/hr} * 8760 \text{ hr/year}}$$
- [P-050406, 7/27/05; 40 CFR 60.49b(d)]

7. PULP DRYERS

Summary Description

This section provides a summary description of the pulp dryers, and has been provided for informational purposes.

The direct-fired pulp dryers are used to dry pressed beet pulp. The dryers are primarily coal-fired, but can also be fired by natural gas. Exhaust gases from each dryer are split into two streams. Each stream is split and passes through two cyclones that operate in parallel. Exhaust from the cyclones is combined and then split between two spray-impingement-type scrubbers that also operate in parallel.

Table 7.1 describes the devices used to control emissions from the pulp dryers.

Table 7.1 EMISSIONS UNITS AND CONTROL EQUIPMENT

Emissions Unit	Control Equipment
North Pulp Dryer (S-D2)	Dryer exhaust is split between two cyclones (A-D2A) that operate in parallel. Cyclone exhaust is combined and then split between two Spray-Impingement Scrubbers (A-D2B) that operate in parallel.
South Pulp Dryer (S-D1)	Dryer exhaust is split between two cyclones (A-D1A) that operate in parallel. Cyclone exhaust is combined and then split between two Spray-Impingement Scrubbers (A-D1B) that operate in parallel.

Table 7.2 contains a summary of requirements that apply generally to the Pulp Dryers. Specific permit requirements are listed below Table 7.2.

Table 7.2 APPLICABLE REQUIREMENTS SUMMARY

Parameters	Permit Conditions	Limits/Standards	Applicable Requirement References	Operating, Monitoring, and Recordkeeping Requirements
Visible emissions	3.22	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.23-3.24, 3.45-3.46
PM (water flow rate, pressure drop, total solids)	7.1	$E = 0.02518(PW)^{0.67}$ (for $PW < 60,000$) $E = 23.84(PW)^{0.11} - 40$ (for $PW \geq 60,000$)	IDAPA 58.01.01.703 40 CFR 64	7.2-7.8, 7.9, 3.45-3.46
Operation and Maintenance	3.36-3.39	Compliance with O&M requirements	IDAPA 58.01.01.322	3.37-3.39, 3.45-3.46
Performance Testing	7.9	Once every 5 years	IDAPA 58.01.01.322	7.9, 3.40-3.44, 3.45-3.46

Emission Limits

7.1 The permittee shall not emit PM to the atmosphere from any equipment used exclusively to dehydrate sugar beet pulp in excess of the amount shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight rate in pounds per hour. The averaging period for this limit is one hour in accordance with IDAPA 58.01.01.700.03.

- The North Pulp Dryer and South Pulp Dryer are each process equipment as defined in IDAPA 58.01.01.006.
- If PW is less than 60,000 lb/hr,

$$E = 0.02518(PW)^{0.67}$$
- If PW is greater than or equal to 60,000 lb/hr,

$$E = 23.84(PW)^{0.11} - 40$$

[IDAPA 58.01.01.703, 4/5/00]

Monitoring and Recordkeeping

7.2 The permittee shall record the process weight input rate to each of the Pulp Dryers monthly. It shall be calculated in accordance with procedures approved by DEQ.

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

Compliance Assurance Monitoring - 40 CFR 64

7.3 CAM 40 CFR 64 - Approved Monitoring

- The permittee shall comply with the approved monitoring requirements for the Pulp Dryers specified in Table 7.3.

Table 7.3 SUMMARY OF CAM REQUIREMENTS

Control Device	Pollutant	Limit ^(a,b)	Indicator ^(a)	Monitoring Approach ^(a)	Indicator Range ^(a) (Monitoring Frequency)
Spray-Impingement Scrubbers (A-D2B, A-D1B)	PM	$E = 0.02518(PW)^{0.67}$ (for $PW < 60,000$) $E = 23.84(PW)^{0.11} - 40$ (for $PW \geq 60,000$)	Water Flow Rate	Flow meter	100-400 gpm (daily average of 15-minute readings)
			Pressure Drop	Manometer	≥ 4.0 iwg; (daily average of 15-minute readings)
			Total Solids	Sampling Scrubber Water at Inlet	$\leq 136,000$ mg/L (monthly sampling Sept to Dec; bi-weekly sampling Jan to campaign end)

a) Each limit, indicator, monitoring approach, and indicator range is applied to the Pulp Dryer North and South scrubbers individually.

b) Emission limits are provided in Permit Condition 7.1.

- An excursion is any of the following:
 - Any day in which the scrubber water flow rate (daily average) in the North Pulp Dryer scrubbers (A-D2B) is below 100 gallons per minute.
 - Any day in which the scrubber water flow rate (daily average) in the South Pulp Dryer scrubbers (A-D1B) is below 100 gallons per minute.
 - Any day in which the scrubber water flow rate (daily average) in the North Pulp Dryer scrubbers (A-D2B) exceeds 400 gallons per minute.
 - Any day in which the scrubber water flow rate (daily average) in the South Pulp Dryer scrubbers (A-D1B) exceeds 400 gallons per minute.
 - Any day in which the pressure drop (daily average) across the North Pulp Dryer scrubbers (A-D2B) is below 4.0 inches of water gauge.

- Any day in which the pressure drop (daily average) across the South Pulp Dryer scrubbers (A–D1B) is below 4.0 inches of water gauge.
- Any sample from the North Pulp Dryer scrubbers (A–D2B) in which the total solids content exceeds 136,000 milligrams per liter.
- Any sample from the South Pulp Dryer scrubbers (A–D1B) in which the total solids content exceeds 136,000 milligrams per liter.

[40 CFR 64.6(c)(2)]

7.4 CAM 40 CFR 64 - Performance Criteria

- *Water Flow Rate*

Each day a pulp dryer is operated:

- At a minimum on a 15-minute basis the scrubber water flow rate shall be measured and recorded for each scrubber.
- At a minimum on a day-ending (“daily”) basis, the daily average scrubber water flow rate shall be calculated and recorded for each scrubber. Each daily average scrubber water flow rate shall be calculated as the arithmetic average of all 15-minute scrubber water flow rate measurements for the scrubber in a given day.
- The permittee shall use the results of each daily average scrubber water flow rate calculation to assess excursions as defined in the approved monitoring (Permit Condition 7.3).

- *Pressure Drop*

Each day a pulp dryer is operated:

- At minimum on a 15-minute basis the pressure drop across each scrubber shall be measured and recorded.
- At a minimum on a day-ending (“daily”) basis, the daily average scrubber pressure drop shall be calculated and recorded for each scrubber. Each daily average scrubber pressure drop shall be calculated as the arithmetic average of all 15-minute scrubber pressure drop measurements for the scrubber in a given day.
- The permittee shall use the results of each daily average scrubber pressure drop calculation to assess excursions as defined in the approved monitoring (Permit Condition 7.3).

- *Total Solids*

- At a minimum on a monthly basis from September to December, the permittee shall collect a representative sample of water from the North Pulp Dryer scrubbers (A–D2B) and from the South Pulp Dryer scrubbers (A–D1B).
- At a minimum on a bi-weekly basis from January until the end of each campaign, the permittee shall collect a representative sample of water from the North Pulp Dryer scrubbers (A–D2B) and from the South Pulp Dryer scrubbers (A–D1B).
- The concentration of total dissolved solids and suspended solids in each sample of water shall be analyzed and recorded.
- The permittee shall use each measurement of total solids to assess excursions as defined in the approved monitoring (Permit Condition 7.3).

[40 CFR 64.3(b)(4); 40 CFR 64.6(c)]

7.5 CAM 40 CFR 64 - Operation of Approved Monitoring

- The permittee shall conduct the approved monitoring (Permit Condition 7.3) upon issuance of this permit.
- At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that a pulp dryer is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for the purposes of CAM, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.
- Upon detecting an excursion or exceedance, the permittee shall restore operation of the pulp dryer (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify DEQ and, if necessary, submit a proposed modification to this operating permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7]

7.6 CAM 40 CFR 64 - Quality Assurance and Control Practices

The permittee shall develop and maintain a quality assurance and control practices (QA/QC) plan for the scrubber water flow meters and for the scrubber manometers adequate to ensure the continuing validity of the data. The permittee shall consider manufacturer recommendations in developing appropriate quality assurance and control practices. QA/QC plans shall be incorporated as part of the O&M manual (Permit Condition 3.38).

[40 CFR 64.3(b)(3); 40 CFR 64.6(c)]

7.7 CAM 40 CFR 64 - Reporting and Recordkeeping

- The reports required by the semiannual monitoring reports and reporting deviations and excess emissions general provisions (Permit Conditions 12.25 and 12.26) shall include the following information:
 - Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

- Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).
- The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under CAM (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Records shall be maintained in accordance with the monitoring and recordkeeping facility-wide condition (Permit Condition 3.45).

[40 CFR 64.9(a), (b)(1)]

7.8 CAM 40 CFR 64 - Quality Improvement Plan

The permittee shall develop and implement a quality improvement plan (QIP) in accordance with 40 CFR 64.8 if an accumulation of exceedances or excursions exceeds 5 percent duration of either the North Pulp Dryer's operating time or the South Pulp Dryer's operating time for a reporting period.

[40 CFR 64.8(a)]

Performance Testing

7.9 A compliance test shall be conducted on each of the Pulp Dryers within one year of permit issuance, and shall be conducted on each of the Pulp Dryers at least once every 5 years, to demonstrate compliance with Permit Condition 7.1. Testing shall be conducted and results reported in accordance with IDAPA 58.01.01.157 and the performance testing facility-wide permit conditions (Permit Condition 3.40 through 3.44), and records shall be maintained in accordance with the monitoring and recordkeeping permit condition (Permit Condition 3.45).

- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157. Test methods and procedures shall comply with IDAPA 58.01.01.157.
- Prior to conducting the test, the permittee shall address the required averaging period in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.
- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the coal feed rate to the Pulp Dryers in tons per hour, pressure drop across the scrubbers (A-D2B, A-D1B), and water flow rate to the scrubbers (A-D2B, A-D1B) during each test.
- For each of the Pulp Dryers, the process weight input (tons per hour) shall be calculated using a DEQ-approved methodology. Parameters and operating data used to calculate the process weight input must also be recorded for each compliance test run. These parameters and operating data include total dried pulp produced (tons per day), dried pulp moisture content (percent by weight), pressed pulp moisture content (percent by weight), fuel heating value (Btu/lb), fuel input per ton of dried pulp (therms per ton), quantity of additives (percent of dry substance per ton of dry pulp), solids content of the additives, and throughput to each dryer (percent).
- For the coal used during the source test, the permittee shall record the high heating value and analysis results, including ash content.
- The permittee shall collect a representative sample of water from the scrubbers (A-D2B, A-D1B) during each test. The concentration of total dissolved solids and suspended solids in the sample water shall be analyzed and recorded, and expressed in milligrams of solids per liter of water.

[IDAPA 58.01.01.322.06-09, 5/1/94]

8. PELLET COOLERS

Summary Description

This section provides a summary description of the pellet coolers, and has been provided for informational purposes.

The emissions from the three pellet coolers are controlled by two cyclones.

Table 8.1 describes the devices used to control emissions from the pellet coolers.

Table 8.1 EMISSIONS UNITS AND CONTROL EQUIPMENT

Emissions Unit	Control Equipment
Pellet Cooler No. 1 (S-D3)	Cyclone (A-D3)
Pellet Cooler No. 2 (S-D4)	Cyclone (A-D4/5)
Pellet Cooler No. 3 (S-D5)	

Table 8.2 contains a summary of requirements that apply generally to the pellet coolers. Specific permit requirements are listed below Table 8.2.

Table 8.2 APPLICABLE REQUIREMENTS SUMMARY

Parameters	Permit Conditions	Limits/Standards	Applicable Requirement References	Operating, Monitoring, and Recordkeeping Requirements
Visible emissions	3.22	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.23-3.24, 3.45-3.46
PM	8.1	$E = 0.045(PW)^{0.60}$ (for $PW < 17,000$) $E = 1.12(PW)^{0.27}$ (for $PW \geq 17,000$)	IDAPA 58.01.01.702	8.2, 3.45-3.46
Operation and Maintenance	3.36-3.39	Compliance with O&M requirements	IDAPA 58.01.01.322	3.37-3.39, 3.45-3.46

Emission Limits

8.1 The permittee shall not emit PM into the atmosphere from any process or process equipment operating prior to October 1, 1979, in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- Pellet Cooler No. 1, Pellet Cooler No. 2, and Pellet Cooler No. 3 are each process equipment as defined in IDAPA 58.01.01.006.
- If PW is less than 17,000 lb/hr,
 $E = 0.045(PW)^{0.60}$
- If PW is equal to or greater than 17,000 lb/hr,
 $E = 1.12(PW)^{0.27}$

[IDAPA 58.01.01.702, 4/5/00]

Monitoring and Recordkeeping

8.2 At least once each year during a planned maintenance outage, or as needed during operation, each cyclone shall be inspected for physical degradation that could affect the performance of the cyclone. The permittee shall make all necessary repairs to the cyclone(s) to ensure efficient operation.

[IDAPA 58.01.01.322.06, 5/1/94]

9. LIME KILN SYSTEM

Summary Description

This section provides a summary description of the lime kiln, and has been provided for informational purposes.

The lime kiln produces calcium oxide (CaO) and concentrated carbon dioxide (CO₂) gas for juice purification. The CaO from the kiln is transferred to Slaker No. 1 (S-K2) to produce milk of lime. The CO₂ gas from the kiln passes through a two-stage high efficiency scrubbing system (A-K1). The gas washer scrubs and cools the exhaust gas prior to the compressors. The compressors convey the CO₂ gas to the first and second carbonation tanks in parallel. The gas is bubbled through the juice from the bottom of the carbonation tanks.

Table 9.1 describes the control equipment used to control emissions from the kiln.

Table 9.1 EMISSIONS UNITS AND CONTROL EQUIPMENT

Emissions Unit	Control Equipment
Lime Kiln (S-K1)	Gas Washer First Carbonation Tank Second Carbonation Tank (A-K1)

Table 9.2 contains a summary of requirements that apply generally to the kiln. Specific permit requirements are listed below Table 9.2.

Table 9.2 APPLICABLE REQUIREMENTS SUMMARY

Parameters	Permit Conditions	Limits/Standards	Applicable Requirement References	Operating, Monitoring, and Recordkeeping Requirements
Visible emissions	9.2, 3.22	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.23-3.24, 3.45-3.46
PM	9.1	<u>First carbonation tank</u> PM ₁₀ ≤ 2.42 lb/hr <u>Second carbonation tank</u> PM ₁₀ ≤ 0.46 lb/hr <u>Pressure relief vent</u> PM ₁₀ ≤ 0.46 lb/hr	P-2010.0043	9.5-9.8, 9.9-9.13 3.45-3.46
	9.3	$E = 0.045(PW)^{0.60}$ (for PW < 9,250) $E = 1.10(PW)^{0.25}$ (for PW ≥ 9,250)	P-2010.0043 IDAPA 58.01.01.701	
NO _x	9.1	20.21 lb/hr	P-2010.0043 IDAPA 58.01.01.322	9.7-9.8, 9.11-9.13, 3.37-3.39, 3.45-3.46
CO		689.8 lb/hr		
SO ₂		0.92 lb/hr		
(gas washer flow and pressure drop)	9.5-9.6			
Sulfur Content	9.4, 3.30-3.31	1% sulfur by weight for coal, as received	IDAPA 58.01.01.725 40 CFR 52.21	3.31, 3.45-3.46
Lime rock input	9.7	770 T/day 146,300 T/yr	P-2010.0043 40 CFR 52.21	9.7, 9.11-9.12, 3.45-3.46
Fuel Usage	9.8	55.2 T/day of coal and/or coke	P-2010.0043 40 CFR 52.21	9.8, 9.13, 3.45-3.46
Operation and Maintenance	3.36-3.39	Compliance with O&M requirements	IDAPA 58.01.01.322	3.37-3.39, 3.45-3.46
Testing	9.14	Annually	P-2010.0043 IDAPA 58.01.01.322	9.14-9.16, 3.40-3.44, 3.45-3.46

Emission Limits

9.1 The emissions from the kiln stacks shall not exceed any emissions rate limit in the following table:

Table 9.3 KILN EMISSION LIMITS ^(a)

Emission Points	PM ₁₀ ^(b) lb/hr ^(c)	SO ₂ lb/hr ^(c)	NO _x lb/hr ^(c)	CO lb/hr ^(c)
First carbonation tank	2.42			
Second carbonation tank	0.46			
Pressure relief vents	0.46			
Kiln, total^(d)	2.88	0.92	20.21	689.8

- In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ approved alternative.
- Total emissions from the first carbonation tank, the second carbonation tank, pressure relief valve(s), and the gas washer combined.

[P-2010.0043, 3/18/14]

9.2 Emissions from the First Carbonation Tank, the Second Carbonation Tank, the compressor Pressure relief vent, the process slaker, or any other stack, vent, or functionally equivalent opening associated with the kiln, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[P-2010.0043, 3/18/14; IDAPA 58.01.01.625, 5/8/09]

9.3 The permittee shall not emit PM into the atmosphere from any process or process equipment in excess of the amount shown by the equations in IDAPA 58.01.01.700-703, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- The kiln is process or process equipment as defined in IDAPA 58.01.01.006.
- If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$
- If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[P-2010.0043, 3/18/14; IDAPA 58.01.01.701, 4/5/00]

Operating Requirements

9.4 The kiln shall combust only anthracite coal and/or coke that meets the following specifications:

- The sulfur content of coal combusted shall not exceed 1.0% by weight on an as received basis.
- The sulfur content of coke combusted shall not exceed 1.0% by weight on an as received basis.

[P-2010.0043, 3/18/14; 40 CFR 52.21]

9.5 The permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the water flow rate to the gas washer. The permittee shall maintain the water flow rate to the gas washer at greater than or equal to the value specified in the O&M manual (Permit Condition 3.38).

[P-2010.0043, 3/18/14]

9.6 The permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the pressure drop across the gas washer. The permittee shall maintain the pressure drop across the gas washer at greater than or equal to the value specified in the O&M manual (Permit Condition 3.38).

[P-2010.0043, 3/18/14]

- 9.7 The permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the lime rock input to the kiln.
- The lime rock input to the kiln shall not exceed 770 tons per day, based on a five day rolling average.
 - The lime rock input to the kiln shall not exceed 146,300 tons per any consecutive 12 calendar month period.
- [P-2010.0043, 3/18/14; 40 CFR 52.21]
- 9.8 The permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the fuel input to the Kiln. The fuel usage (anthracite coal and/or coke combined) for the Kiln shall not exceed 55.2 tons per day, based on a five-day rolling average.
- [P-2010.0043, 3/18/14; 40 CFR 52.21]

Monitoring and Recordkeeping

- 9.9 When the Kiln is operated, the permittee shall continuously monitor and record on a daily basis the water flow rate to the Gas Washer to ensure compliance with the Gas Washer flow rate specified in the O&M manual (Permit Condition 3.38).
- [P-2010.0043, 3/18/14]
- 9.10 When the Kiln is operated, the permittee shall continuously monitor and record on a daily basis the pressure drop across the Gas Washer to ensure compliance with the Gas Washer pressure drop specified in the O&M manual (Permit Condition 3.38).
- [P-2010.0043, 3/18/14]
- 9.11 When the kiln is operated, the permittee shall monitor continuously and record on a daily basis the lime rock input to the kiln in tons per calendar day and the lime rock input to the Kiln in tons per rolling 5-day average to demonstrate compliance with the Kiln daily throughput limit (Permit Condition 9.7). The 5-day rolling average lime rock input to the Kiln shall be calculated each calendar day as the arithmetic average of the lime rock input to the Kiln measured for the given calendar day and the four calendar days immediately preceding that day.
- [P-2010.0043, 3/18/14]
- 9.12 The permittee shall record on a monthly basis the lime rock input to the Kiln in tons per calendar month and in tons per consecutive 12 calendar month period to demonstrate compliance with the Kiln annual throughput limit (Permit Condition 9.7). The 12 calendar month rolling average lime rock input to the Kiln shall be calculated each calendar month as the arithmetic average of the lime rock input to the Kiln measured for the given calendar month and the eleven calendar months immediately preceding that month.
- [P-2010.0043, 3/18/14]
- 9.13 When the Kiln is operated, the permittee shall monitor continuously and record on a daily basis the amount of fuel input to the Kiln in tons per calendar day and the amount of fuel input to the Kiln in tons per rolling 5-day average to demonstrate compliance with the Kiln fuel usage limit (Permit Condition 9.8). The 5-day rolling average fuel usage shall be calculated each calendar day as the arithmetic average of the fuel input to the kiln measured for the given calendar day and the four calendar days immediately preceding that day.
- [P-2010.0043, 3/18/14]

Performance Testing

- 9.14 Performance testing shall be conducted on the kiln emission points according to the following schedule, to demonstrate compliance with the CO, NO_x, and visible emission limits (Permit Conditions 9.1, 9.2, and 3.22), in accordance with IDAPA 58.01.01.211, IDAPA 58.01.01.157, and the performance testing general provisions (Permit Conditions 3.40 through 3.44):
- If the pollutant emission rate measured in the most recent test is less than or equal to 50% of the emission standard (Permit Condition 9.1), the next test shall be conducted within five years of the test date.

- If the pollutant emission rate measured during the most recent performance test is greater than 50% of the emission standard (Permit Condition 9.1), the next test shall be conducted within three years of the test date.
- Visible emission testing (Permit Conditions 9.2, 3.22) shall be conducted on the same date that any other pollutant testing is required by this permit condition.

[P-2010.0043, 3/18/14]

9.15 Each performance test shall be conducted in accordance with IDAPA 58.01.01.157, the performance testing general provisions (Permit Conditions 3.40–3.44), the test methods requirement (Permit Condition 3.43), and under the following operating conditions, unless otherwise approved by DEQ:

- Visible emissions shall be measured at the first carbonation tank, second carbonation tank, and pressure relief vents.
- CO and NO_x emissions shall be measured at the first carbonation tank and the second carbonation tank.
- The kiln shall be operated at maximum capacity (at least 80% of the maximum rated equipment throughput or greater) during the source test period unless otherwise approved by DEQ.
- Parameters shall be monitored and recorded as specified in the performance test monitoring requirement (Permit Condition 9.16).
- If the pressure relief valves are open during the tests, the excess gas shall be ducted to the first carbonation tank during the test so emissions from the pressure relief vents are included in the first carbonation tank emissions.

[P-2010.0043, 3/18/14]

9.16 The permittee shall monitor and record the following operating conditions for the kiln during each performance test, unless otherwise approved by DEQ:

- The amount of coal combusted in the kiln, in tons per test and average tons per hour (T/hr);
- The amount of coke combusted in the kiln, in tons per test and average tons per hour (T/hr);
- The amount of lime rock processed in the kiln (throughput), in tons per test and average tons per hour (T/hr);
- The ash content and sulfur content of the coal fuel fired on a dry weight basis;
- The ash content and sulfur content of the coke fuel fired on a dry weight basis;
- The pressure drop across the Gas Washer in inches water gauge (iwg), at least once every 20 minutes;
- The Gas Washer water flow rate in gallons per minute (gpm), at least once every 20 minutes;
- Whether the pressure relief valve was open (venting) at any time during each test, or closed for the duration of each test.
- The permittee shall furnish DEQ a written report of the results of each performance test, in accordance with IDAPA 58.01.01.157 and the performance testing facility-wide condition (Permit Condition 3.44).

[P-2010.0043, 3/18/14]

10. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in Table 10.1 to qualify for a permit shield. There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the facility-wide conditions (Section 3).

Table 10.1 INSIGNIFICANT ACTIVITIES

Location	Emission Point/Source Identification	Description	Insignificant Activities IDAPA 58.01.01.317.01 Citation
Lime Kiln		Lime rock handling and coke and/or anthracite coal handling	(b)(i)5
		Slakers #1, #2, #3, and #4	(b)(i)30
Acid Tanks	220	Heater Boilout Mix Tank (Muriatic Acid), Vent	(b)(i)19
	221	Heater Boilout Mix Tank, Open Manway	(b)(i)19
	222	Muriatic Acid Tank Vent	(b)(i)19
	223	Vacuum Drum Filters Muriatic Acid Tank, Vent	(b)(i)19
	224	Heater Boilout Mix Tank (Caustic), Vent	(b)(i)19
	225	Heater Boilout Mix Tank (Caustic), Vent	(b)(i)19
	226	Aluminum Bisulphate Tank, Vent	(b)(i)19
	227	Caustic Tank, Vent	(b)(i)19
	228	Caustic Tank, Vent	(b)(i)19
	229	Caustic Tank, Vent	(b)(i)19
	230	Busan 1007 Tank, Vent	(b)(i)19
	231	Busan 1007 Tank, Vent	(b)(i)19
	232	BCC-315 Tank, Vent	(b)(i)19
	233	BCC-315 Tank, Vent	(b)(i)19
	234	BCC-315 Tank, Vent	(b)(i)19
	235	Sulfuric Acid Tank, Vent	(b)(i)19
236	Brine Tank, Vent	(b)(i)19	
Tare Lab	252	South Boiler, Stack	(b)(i)5
	255	North Boiler, Stack	(b)(i)5
	256	Brei Dust Fan, Exhaust	(b)(i)30
	257	Space Heater, Exhaust	(b)(i)18
Granulator System	S-W1	Granulator System	(b)(i)30
	S-W2	Cooling Granulator No. 1	(b)(i)30
	S-W3	Cooling Granulator No. 2	(b)(i)30
Sugar Handling System	SW-4	Process Sugar Handling System	(b)(i)30
	SW-5	Bulk Loadout Sugar Handling System	(b)(i)30
Miscellaneous	Not applicable	Propane lances for heating rail cars	(b)(i)5
		Lime rock and coke handling from rail cars and storage piles into lime kiln building	(b)(i)30
		Sugar silos #1, #2, and #3	(b)(i)30
		Coke and anthracite unloading and storage pile	(b)(i)30
		Lime rock unloading and storage pile	(b)(i)30

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

11. NON-APPLICABLE REQUIREMENT DETERMINATIONS

- 11.1** The standards for fuel-burning equipment particulate matter, IDAPA 58.01.01.675, do not apply to the pulp dryers or to the Kiln under Sections 7 and 9 of this permit.
- 11.2** Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D, do not apply to the B&W Boiler or to the Erie City Boiler under Sections 4 and 5 of this permit.

[IDAPA 58.01.01.325.01.b, 5/1/94]

12. GENERAL PROVISIONS

General Compliance

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

Reopening

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

Property Rights

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

Information Requests

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

Severability

- 12.9 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.
[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

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

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

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

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

Federal and State Enforceability

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

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

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

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

Inspection and Entry

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

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

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

New Applicable Requirements

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

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

Fees

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

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

Certification

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

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

Renewal

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

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

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

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

Permit Shield

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

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

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 5/1/94; IDAPA 58.01.01.325, 3/19/99; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

12.21 The permittee shall comply with the following:

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

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

Periodic Compliance Certification

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

- The compliance certifications for all emissions units shall be submitted annually from October 1 to September 30 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
- The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
 - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
 - The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
 - Such information as DEQ may require to determine the compliance status of the emissions unit.
- 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

- 12.23 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125, 3/23/98]

No Tampering

- 12.24 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports

- 12.25 In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from October 1 through March 31 and April 1 through September 30. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 45 days of the end of the specified reporting period.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

- 12.26 The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

- 12.27 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

- 12.28 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)]