State of Idaho
Department of Environmental Quality
Air Quality Division

AIR QUALITY PERMIT
STATEMENT OF BASIS

Tier I Operating Permit No. T1-2011.0121

Project No. 60913

Proposed for EPA Review

Tamarack Mill, LLC dba Evergreen Forests and Tamarack Energy Partnership

Tamarack Mill

City, Idaho

Facility ID No. 003-00001

November 21, 2014

Robert Baldwin

Permit Writer

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

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1. Acronyms, Units and Chemical Nomenclature

acfm actual cubic feet per minute
AFS AIRS Facility Subsystem
AIRS Aerometric Information Retrieval System
AQCR Air Quality Control Region
BACT Best Available Control Technology
Btu British thermal unit
CAA Clean Air Act
CFR Code of Federal Regulations
CO carbon monoxide
DEQ Department of Environmental Quality
dscf dry standard cubic feet
EPA U.S. Environmental Protection Agency
gpm gallons per minute
HAP hazardous air pollutants
hp horsepower
IDAPA a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km kilometer
lb/hr pounds per hour
m meter(s)
MACT Maximum Achievable Control Technology
MMBtu million British thermal units
MRRR Monitoring, Recordkeeping and Reporting Requirements
NESHAP National Emission Standards for Hazardous Air Pollutants
NO_2 nitrogen dioxide
NO_x nitrogen oxides
NSPS New Source Performance Standards
PC permit condition
PM particulate matter
PM_{10} particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm parts per million
PSD Prevention of Significant Deterioration
PTC permit to construct
PTE potential to emit
Rules Rules for the Control of Air Pollution in Idaho
scf standard cubic feet
SIC Standard Industrial Classification
SIP State Implementation Plan
SM Synthetic Minor
SO_2 sulfur dioxide
SO_x sulfur oxides
Tier I Tier I operating permit
T/yr tons per year
UTM Universal Transverse Mercator
VOC volatile organic compound

2. INTRODUCTION AND APPLICABILITY

Tamarack Mills, LLC dba Evergreen Forest and Tamarack Energy Partnership (Tamarack Mills) is a manufacturer of dry kiln lumber and cogeneration of energy, and is located at New Meadows. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit PM_{10} and CO above the major source threshold of 100 tons-per-year. At the time of this permitting action, the facility is not a major source of HAP emissions. As a major facility, Tamarack Mills is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from Tamarack Mills as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

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

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

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

Section 1- Acronyms, Units, and Chemical Nomenclature

Section 1 states the full name of the acronyms, units, and chemical nomenclature stated within the permit.

Section 2 – Tier I Operating Permit Scope

The scope describes this permitting action.

Section 3 – Facility-Wide Conditions

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

Sections 4 through 7 – Emissions Unit/Source Name

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

Section 8 – Compliance Assurance Monitoring

A compliance assurance monitoring plan states the monitoring required by the facility to assure the unit subject to a CAM plan is operating within compliance.

Section 9 – Non-applicable Requirements and Insignificant Activities

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

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

Section 10 – General Provisions

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

3. FACILITY INFORMATION

3.1 Facility Description

Tamarack Mills facility is located approximately 6 miles SW of New Meadows, Idaho on Highway 95. Tamarack Energy Partnership is a topping cycle cogeneration facility. Evergreen Forest's sawmill processes logs into green dimensional lumber. The green dimensional lumber is dried in kilns. The facility processes approximately 35% white fir, 35% Douglas fir, 15% ponderosa pine, 10-15% lodge pine, and 0-5% larch or spruce. Wood waste is burned to produce steam in a water wall boiler. Steam from the boiler is piped to a turbine which powers an electrical generator. After steam from the biomass-fired boiler passes through the electrical generation process, it will be supplied to the lumber drying kilns (No. 1 through 6). The facility sells energy to Idaho Power Company.

3.2 Facility Permitting History

3.2.1 Tier I Operating Permit History – Previous 5-year permit term 2007 to 2012

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

February 7, 2007	Tier 1 operating permit renewal for T1-050009 (S)
March 27, 2009	T1-2007.0161, T1 amendment incorporated terms of T2-050047, Permit status (A)

3.2.2 Underlying Permit History – Includes every underlying permit issued to this facility

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

September 1, 1980	Operating Permit No. 13-0040-0001-00 was issued to Evergreen Forest Products. The permit cover letter states that the permit governs the operations of the sawmill. However, the only emission units included in the permit are a conical wood waste incinerator and three wood-fired boilers, none exist today at the facility.
December 30, 1982	A letter was issued to Tamarack Energy that serves as the permit to construct for the "wood residue-fired cogeneration unit". The only emission limits in the permit are 20% opacity and the grain-loading standard for fuel-burning equipment (0.080 grains per dry cubic foot of effluent gas corrected to 8% oxygen).
October 31, 1996	A Director's exemption was issued to Yanke Energy, Tamarack's consultant, for the temporary burning of scrap railway ties.
July 3, 2001	DEQ approves burning of scrap wood in the cogeneration boiler. Approximately 3,000 tons of scrap wood will be received from the Jaype Plywood facility in Pierce, Idaho.
September 17, 2002	DEQ issued Tamarack a Tier I Operating Permit. (S)
February 6, 2003	DEQ issued an administrative amended Tier I Operating Permit.(S)
February 7, 2007	T1-050009 Tier I renewal(S)
July 27, 2007	Tier II/PTC T2-050047 fulfilled requirements of Compliance Schedule of Tier I

	operating permit.(S)
March 27, 2009	T1-2007.0161 Tier I amendment incorporated T2-050047 (S)
November 4, 2009	P-2009.0064, construction of three drying kilns (S)
May 31, 2011	P-2009.0064 project 60856 a PTC revision to combine PTC P-2009.0064 and Tier II/PTC T2-050047(A)
December 13, 2013	P-2009.0064 Project 61224, modification for construction of three (3) additional kilns (A)

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

4.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit. This permit will incorporate the permitting action of P-2009.0064 project No. 61224 issued December 13, 2013. This permit will supersede the Tier I modified permit T1-2007.0161 issued on March 27, 2009 and the Tier I permit T1-050009 issued on February 7, 2007. This Tier I operating permit will address the new federal regulations applicable to this facility. This Tier I operating permit will incorporate the Permit to Construct issued on December 13, 2013 for three additional kilns.

4.2 Application Chronology

August 5, 2011	DEQ received a letter requesting renew of the existing Tier I operating permit
August 15, 2011	DEQ received the FORM GI
August 24, 2011	DEQ via email notified facility a CAM plan is needed to determine application complete
September 26, 2011	DEQ via email received a CAM plan
September 28, 2011	DEQ via email notified facility of the federal regulations that may be applicable to the facility
September 28, 2011	DEQ received via email the facility's acknowledgement and explanation of which federal regulation are applicable to the facility
October 6, 2011	DEQ determined the application complete
August 16, 2013	Tamarack submitted a CAM plan with documentation substantiating the conditions.
February 28, 2014	Draft permit sent to facility for review
May 15, 2014	Last of three responses were received from the facility.
August 6 to September 5, 2014	Public Comment Period
September 17, 2014	Sent to EPA for Review

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

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

5.1 Process No. 1 – Yanke Energy Hog Fuel Boiler (Riley)

Table 5.1 lists the emissions units and control devices associated with Yanke Energy Hog Fuel Boiler (Riley).

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

Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Yanke Energy Hog Fuel Boiler (Riley)	Multiclone and Wet Scrubber	Boiler Stack

The Tamarack Energy Partnership Cogeneration Unit produces electricity from a stream-powered turbine. Steam is produced in a biomass-fired boiler. A multiclone and wet scrubber control particulate matter emissions from the boiler. Ash collected from the boiler, multiclone and scrubber is landfilled onsite. Table 5.1 describes the devices used to control emissions from the Yanke Energy Hog Fuel boiler (Riley Boiler). The Riley boiler is an industrial boiler operating an area source of hazardous air pollutants (HAPs) subject to 40 CFR 63 subpart JJJJJJ. The requirements of 40 CFR 63 subpart JJJJJJ applicable to Tamarack Mills are new in this permitting action as they apply.

5.2 Process No. 2 – Sawdust Target Box And Chip Target Box (St-3/4)

Table5.2 lists the emissions units and control devices associated with sawdust target box and chip target box (St-3/4)

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

Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Sawdust target box	None	Vent
Chip target box	None	Vent

In the sawmill building, the sawdust and wood trimmings are collected and separated by various types of equipment. The collected sawdust is pneumatically transferred to a target box. The collected wood trimmings go through a chipper. The chips are pneumatically transferred to a target box. Each target box has a vent to the atmosphere. Table 5.2 describes the devices used to control emissions from Sawdust Target Box and Chip Target Box (ST-3/4).

5.3 Process No. 3 Emergency Internal Combustion Engine

Table 5.3 lists the emissions units and control devices associated with the emergency internal combustion engine.

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

Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Emergency internal combustion engine	None	Engine exhaust stack

A 150 horsepower diesel-fired internal combustion engine is used to operate a fire pump in case of a fire emergency. The engine is started periodically and run for short periods of time as part of a general maintenance program. Table 5.3 describes the devices used to control emissions from the Emergency Internal Combustion Engine. The internal combustion engine is subject to the maintenance and reporting requirements of 40 CFR 63, subpart ZZZZ beginning May 3, 2013. The requirements of 40 CFR 63 subpart ZZZZ applicable to Tamarack Mills are included in this permitting action as they apply.

5.4 Process No. 4 – Lumber Drying Kilns (No. 1, 2, 3, 4, 5, and 6)

Table 5.4 lists the emissions units and control devices associated with lumber drying kilns (No. 1 through 6).

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

Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Lumber drying kiln (No.1 through 6)	None	Kilns vents

Six Wellons double-track lumber drying kilns (No. 1, 2, 3, 4, 5, and 6) are located to the southeast side of the Tamarack Mill, LLC facility for drying of green lumber. After steam from the biomass-fired boiler passes through the electrical generation process, it is supplied to the Lumber Drying Kilns (No. 1 through 6). Table 5.4 describes the devices used to control emissions from the Lumber Drying Kilns (No. 1through 6).

5.5 Insignificant Emissions Units Based On Size Or Production Rate

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

Table 5.5 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit/Activity	Regulatory Authority/Justification
Bark blow line	30
Horizontal Resaw	30
Quad Saw	30
Gang Saw	30
Double Arbor Gang Saw	30
Vertical Resaw	30
Double Cut Headrig	30
Double Cut Saw	30
Trim saw	30
Operation, loading and unloading of storage tanks and storage vessels, with lids or other appropriate closure and less than 260 gallon capacity, 35 cubic feet, heated only to the minimum extent to avoid solidification if necessary	1
Operation, loading and unloading of storage tanks, not greater than 1,100 gallon capacity, with lids or other appropriate closure, not for use with hazardous air pollutants, max. vapor pressure of 550mmHg	2
Welding using not more than one ton per day of welding rod	9
Water cooling towers and ponds, not using chromium-based corrosion inhibitors, not used with barometric jets or condensers, not greater than 10,000 gpm, not in direct contact with gaseous or liquid process streams containing regulated air pollutants	13
Municipal and industrial water chlorination facilities of not greater than 20,000,000 gallons per day capacity. The exemption does not apply to waste water treatment.	16
Surface coating using less than two gallons per day	17
Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than 5 MMBtu/hr	18
Milling and grinding activities, using paste-form compounds with less than one percent volatile organic compounds	22
Surface coating, aqueous solution or suspension containing less than one percent volatile organic compounds27	25
Storage and handling of water-based lubricants for 30metal working where the organic content of the lubricant is less than 10%	27
Two 2,000-gallon 12% bleach tanks, which are an emission unit or activity with potential emissions less than or equal to the significant emission rate as defined in Section 006 and actual emissions less than or equal to 10% of the levels contained in Section 006 of the definition of significant and no more than one ton per year of any hazardous air pollutant	30

Non-Applicable Requirements For Which A Permit Shield Are Requested

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

Requirements for Which a Permit Shield Will Be Granted

No permit shield was requested and no permit shield was granted.

Requirements for Which a Permit Shield Will Not Be Granted

No permit shield was requested and no permit shield was granted.

5.6 Emissions Inventory

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

Listed in Table 5.6 is an estimate of the emissions for the regulated sources . The documentation for this emission table were provided in prior issued permits to construct and Tier I operating permitting actions. These are the same emission values used in the prior Tier I operating permits except for the kilns emissions which were address in the PTC for the kilns (P-2009.0064 12/13/13).

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

Emissions Unit Description	PM_{10}	NO_X	SO_2	CO	VOC	HAP
Riley Boiler	77.4	88.0	10	242	6.8	---
Sawdust and Chip Target Boxes	3.36	---	---	---	---	---
Emergency Internal Combustion Engine	0.83	0.16	0.78	0.25	0.93	---
Lumber Drying Kilns (No.1 through 6)	1.9	---	---	---	60.4	5.9
TOTAL EMISSIONS	**82.67**	**88.0**	**10**	**242**	**67.2**	**5.9**

6. EMISSIONS LIMITS AND MRRR

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

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

This section contains the following subsections:

- Facility-Wide Conditions;
- Yanke Energy Hog Fuel Boiler (Riley) Emissions Limits;
- Sawdust and Chip Target Boxes Emissions Limits;
- Emergency Internal Combustion Engine Emissions Limits;
- Lumber Drying Kilns (No. 1, 2 and 3) Emissions Limits; and
- Tier I Operating Permit General Provisions.

MRRR

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, describe why and how the condition was changed. See instructions on the cover page for Appendix D for other options.

State Enforceability

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

Federal Enforceability

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

To minimize the length of this document, the MRRR for the facility-wide permit conditions has been paraphrased. Refer to the permit for the complete requirement.

6.1 Facility-wide Conditions

Permit Condition 3.1 – Fugitive Dust

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

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

MRRR (Permit Conditions 3.2 through 3.4)

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

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

Permit Condition 3.5 – Odors

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

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

MRRR (Permit Condition 3.6)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

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

Permit Condition 3.7 – Visible Emissions

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

[IDAPA 58.01.01.625, 4/5/00]

MRRR (Permit Conditions 3.8 and 3.9)

- Conduct a monthly facility-wide inspection during daylight hours and under normal operating conditions for the purposes of observing points of visible emissions from all emissions units subject to the visible emissions standards.
- Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition.
    - Each inspection shall be conducted as follows:

- Initial 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:
    - Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions, and conduct another see/no see evaluation within 24 hours. If the visible emissions are not eliminated, the permittee shall comply with b).

OR

- Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. If the measured opacity is greater than 20% for the time period specified in Section 625, the permittee shall take corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

- Records of each visible emission inspection and each opacity test and corrective action taken are to be maintained at the permitted facility.

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

Permit Condition 3.10 – Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 3.9 and the regulations of IDAPA 58.01.01.130-136.

MRRR(Permit Conditions 3.11, 3.12, 3.13 and 3.14)

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

Permit Condition 3.15 – Distillate Fuel Oil Sulfur Content Limits

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

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

[IDAPA 58.01.01.728, 5/1/94]

MRRR – (Permit Condition 3.16)

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

[IDAPA 58.01.01.322.06, 5/1/94]

Permit Condition 3.17 – Open Burning

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

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

MRRR (Permit Condition 3.17)

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

Permit Condition 3.18 - Asbestos

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

[40 CFR 61, Subpart M]

MRRR

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

Permit Condition 3.19 - Accidental Release Prevention

(a)

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

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

[40 CFR 68.10 (a)]

MRRR (Permit Condition 3.19)

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

Permit Condition 3.20 - Recycling and Emissions Reductions

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

[40 CFR 82, Subpart F]

MRRR (Permit Condition 3.20)

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

Permit Condition 3.21 through 3.23- NSPS/NESHAP General Provisions

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

[40 CFR 60, Subpart A]

Table 3.4. NESHAP 40 CFR 63, Subpart ZZZZ—Summary Of General Provisions.

TABLE 3.4 TO SUBPART ZZZZ OF PART 63—APPLICABILITY OF GENERAL PROVISIONS TO SUBPART ZZZZ.

General provisions citation	Subject of citation	Applies to subpart	Explanation
§ 63.1	General applicability of the General Provisions	Yes.	

§ 63.2	Definitions	Yes	Additional terms defined in § 63.6675.
§ 63.3	Units and abbreviations	Yes.	
§ 63.4	Prohibited activities and circumvention	Yes.	
§ 63.5	Construction and reconstruction	Yes.	
§ 63.6(a)	Applicability	Yes.	
§ 63.6(b)(1)-(4)	Compliance dates for new and reconstructed sources	Yes.	
§ 63.6(b)(5)	Notification	Yes.	
§ 63.6(b)(6)	[Reserved]		
§ 63.6(b)(7)	Compliance dates for new and reconstructed area sources that become major sources	Yes.	
§ 63.6(c)(1)-(2)	Compliance dates for existing sources	Yes.	
§ 63.6(c)(3)-(4)	[Reserved]		
§ 63.6(c)(5)	Compliance dates for existing area sources that become major sources	Yes.	
§ 63.6(d)	[Reserved]		
§ 63.6(e)	Operation and maintenance	No.	
§ 63.6(f)(1)	Applicability of standards	No.	
§ 63.6(f)(2)	Methods for determining compliance	Yes.	
§ 63.6(f)(3)	Finding of compliance	Yes.	
§ 63.6(g)(1)-(3)	Use of alternate standard	Yes.	
§ 63.6(h)	Opacity and visible emission standards	No	Subpart ZZZZ does not contain opacity or visible emission standards.
§ 63.6(i)	Compliance extension procedures and criteria	Yes.	
§ 63.6(j)	Presidential compliance exemption	Yes.	
§ 63.7(a)(1)-(2)	Performance test dates	Yes	Subpart ZZZZ contains performance test dates at §§ 63.6610, 63.6611, and 63.6612.
§ 63.7(a)(3)	CAA section 114 authority	Yes.	
§ 63.7(b)(1)	Notification of performance test	Yes	Except that § 63.7(b)(1) only applies as specified in § 63.6645.
§ 63.7(b)(2)	Notification of rescheduling	Yes	Except that § 63.7(b)(2) only applies as specified in § 63.6645.
§ 63.7(c)	Quality assurance/test plan	Yes	Except that § 63.7(c) only applies as specified in § 63.6645.
§ 63.7(d)	Testing facilities	Yes.	
§ 63.7(e)(1)	Conditions for conducting performance tests	No.	Subpart ZZZZ specifies conditions for conducting performance tests at § 63.6620.
§ 63.7(e)(2)	Conduct of performance tests and reduction of data	Yes	Subpart ZZZZ specifies test methods at § 63.6620.
§ 63.7(e)(3)	Test run duration	Yes.	

§ 63.7(e)(4)	Administrator may require other testing under section 114 of the CAA	Yes.	
§ 63.7(f)	Alternative test method provisions	Yes.	
§ 63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes.	
§ 63.7(h)	Waiver of tests	Yes.	
§ 63.8(a)(1)	Applicability of monitoring requirements	Yes	Subpart ZZZZ contains specific requirements for monitoring at § 63.6625.
§ 63.8(a)(2)	Performance specifications	Yes.	
§ 63.8(a)(3)	[Reserved]		
§ 63.8(a)(4)	Monitoring for control devices	No.	
§ 63.8(b)(1)	Monitoring	Yes.	
§ 63.8(b)(2)-(3)	Multiple effluents and multiple monitoring systems	Yes.	
§ 63.8(c)(1)	Monitoring system operation and maintenance	Yes.	
§ 63.8(c)(1)(i)	Routine and predictable SSM	Yes.	
§ 63.8(c)(1)(ii)	SSM not in Startup Shutdown Malfunction Plan	Yes.	
§ 63.8(c)(1)(iii)	Compliance with operation and maintenance requirements	Yes.	
§ 63.8(c)(2)-(3)	Monitoring system installation	Yes.	
§ 63.8(c)(4)	Continuous monitoring system (CMS) requirements	Yes	Except that subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).
§ 63.8(c)(5)	COMS minimum procedures	No	Subpart ZZZZ does not require COMS.
§ 63.8(c)(6)-(8)	CMS requirements	Yes	Except that subpart ZZZZ does not require COMS.
§ 63.8(d)	CMS quality control	Yes.	
§ 63.8(e)	CMS performance evaluation	Yes	Except for § 63.8(e)(5)(ii), which applies to COMS.
		Except that § 63.8(e) only applies as specified in § 63.6645.	
§ 63.8(f)(1)-(5)	Alternative monitoring method	Yes	Except that § 63.8(f)(4) only applies as specified in § 63.6645.
§ 63.8(f)(6)	Alternative to relative accuracy test	Yes	Except that § 63.8(f)(6) only applies as specified in § 63.6645.
§ 63.8(g)	Data reduction	Yes	Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at §§ 63.6635 and 63.6640.
§ 63.9(a)	Applicability and State delegation of notification requirements	Yes.	
§ 63.9(b)(1)-(5)	Initial notifications	Yes	Except that § 63.9(b)(3) is reserved.
		Except that § 63.9(b) only applies as	

		specified in § 63.6645.	
§ 63.9(c)	Request for compliance extension	Yes	Except that § 63.9(c) only applies as specified in § 63.6645.
§ 63.9(d)	Notification of special compliance requirements for new sources	Yes	Except that § 63.9(d) only applies as specified in § 63.6645.
§ 63.9(e)	Notification of performance test	Yes	Except that § 63.9(e) only applies as specified in § 63.6645.
§ 63.9(f)	Notification of visible emission (VE)/opacity test	No	Subpart ZZZZ does not contain opacity or VE standards.
§ 63.9(g)(1)	Notification of performance evaluation	Yes	Except that § 63.9(g) only applies as specified in § 63.6645.
§ 63.9(g)(2)	Notification of use of COMS data	No	Subpart ZZZZ does not contain opacity or VE standards.
§ 63.9(g)(3)	Notification that criterion for alternative to RATA is exceeded	Yes	If alternative is in use.
		Except that § 63.9(g) only applies as specified in § 63.6645.	
§ 63.9(h)(1)-(6)	Notification of compliance status	Yes	Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. § 63.9(h)(4) is reserved.
			Except that § 63.9(h) only applies as specified in § 63.6645.
§ 63.9(i)	Adjustment of submittal deadlines	Yes.	
§ 63.9(j)	Change in previous information	Yes.	
§ 63.10(a)	Administrative provisions for recordkeeping/reporting	Yes.	
§ 63.10(b)(1)	Record retention	Yes.	
§ 63.10(b)(2)(i)-(v)	Records related to SSM	No.	
§ 63.10(b)(2)(vi)-(xi)	Records	Yes.	
§ 63.10(b)(2)(xii)	Record when under waiver	Yes.	
§ 63.10(b)(2)(xiii)	Records when using alternative to RATA	Yes	For CO standard if using RATA alternative.
§ 63.10(b)(2)(xiv)	Records of supporting documentation	Yes.	
§ 63.10(b)(3)	Records of applicability determination	Yes.	
§ 63.10(c)	Additional records for sources using CEMS	Yes	Except that § 63.10(c)(2)-(4) and (9) are reserved.
§ 63.10(d)(1)	General reporting requirements	Yes.	
§ 63.10(d)(2)	Report of performance test results	Yes.	
§ 63.10(d)(3)	Reporting opacity or VE observations	No	Subpart ZZZZ does not contain opacity or VE standards.
§ 63.10(d)(4)	Progress reports	Yes.	
§ 63.10(d)(5)	Startup, shutdown, and malfunction reports	No.	

§ 63.10(e)(1) and (2)(i)	Additional CMS Reports	Yes.	
§ 63.10(e)(2)(ii)	COMS-related report	No	Subpart ZZZZ does not require COMS.
§ 63.10(e)(3)	Excess emission and parameter exceedances reports	Yes.	Except that § 63.10(e)(3)(i) (C) is reserved.
§ 63.10(e)(4)	Reporting COMS data	No	Subpart ZZZZ does not require COMS.
§ 63.10(f)	Waiver for recordkeeping/reporting	Yes.	
§ 63.11	Flares	No.	
§ 63.12	State authority and delegations	Yes.	
§ 63.13	Addresses	Yes.	
§ 63.14	Incorporation by reference	Yes.	
§ 63.15	Availability of information	Yes.	

[40 CFR 63, Subpart ZZZZ, Table 8]

TABLE 3.5 TO SUBPART JJJJJJ OF PART 63—APPLICABILITY OF GENERAL PROVISIONS TO SUBPART JJJJJJ

As stated in § 63.11235, you must comply with the applicable General Provisions according to the following:

General provisions cite	Subject	Does it apply?
§ 63.1	Applicability	Yes.
§ 63.2	Definitions	Yes. Additional terms defined in § 63.11237.
§ 63.3	Units and Abbreviations	Yes.
§ 63.4	Prohibited Activities and Circumvention	Yes.
§ 63.5	Preconstruction Review and Notification Requirements	No
§ 63.6(a), (b)(1)-(b)(5), (b)(7), (c), (f)(2)-(3), (g), (i), (j)	Compliance with Standards and Maintenance Requirements	Yes.
§ 63.6(e)(1)(i)	General Duty to minimize emissions	No.*See* § 63.11205 for general duty requirement.
§ 63.6(e)(1)(ii)	Requirement to correct malfunctions ASAP	No.
§ 63.6(e)(3)	SSM Plan	No.
§ 63.6(f)(1)	SSM exemption	No.
§ 63.6(h)(1)	SSM exemption	No.
§ 63.6(h)(2) to (9)	Determining compliance with opacity emission standards	Yes.
§ 63.7(a), (b), (c), (d) , (e)(2)-(e)(9), (f), (g), and (h)	Performance Testing Requirements	Yes.

§ 63.7(e)(1)	Performance testing	No.*See* § 63.11210.
§ 63.8(a), (b), (c)(1), (c)(1)(ii), (c)(2) to (c)(9), (d)(1) and (d)(2), (e),(f), and (g)	Monitoring Requirements	Yes.
§ 63.8(c)(1)(i)	General duty to minimize emissions and CMS operation	No.
§ 63.8(c)(1)(iii)	Requirement to develop SSM Plan for CMS	No.
§ 63.8(d)(3)	Written procedures for CMS	Yes, except for the last sentence, which refers to an SSM plan. SSM plans are not required.
§ 63.9	Notification Requirements	Yes, excluding the information required in § 63.9(h)(2)(i)(B), (D), (E) and (F). See § 63.11225.
§ 63.10(a) and (b)(1)	Recordkeeping and Reporting Requirements	Yes.
§ 63.10(b)(2)(i)	Recordkeeping of occurrence and duration of startups or shutdowns	No.
§ 63.10(b)(2)(ii)	Recordkeeping of malfunctions	No.*See* § 63.11225 for recordkeeping of (1) occurrence and duration and (2) actions taken during malfunctions.
§ 63.10(b)(2)(iii)	Maintenance records	Yes.
§ 63.10(b)(2)(iv) and (v)	Actions taken to minimize emissions during SSM	No.
§ 63.10(b)(2)(vi)	Recordkeeping for CMS malfunctions	Yes.
§ 63.10(b)(2)(vii) to (xiv)	Other CMS requirements	Yes.
§ 63.10(b)(3)	Recordkeeping requirements for applicability determinations	No.
§ 63.10(c)(1) to (9)	Recordkeeping for sources with CMS	Yes.
§ 63.10(c)(10)	Recording nature and cause of malfunctions	No.*See* § 63.11225 for malfunction recordkeeping requirements.
§ 63.10(c)(11)	Recording corrective actions	No.*See* § 63.11225 for malfunction recordkeeping requirements.
§ 63.10(c)(12) and (13)	Recordkeeping for sources with CMS	Yes.
§ 63.10(c)(15)	Allows use of SSM plan	No.
§ 63.10(d)(1) and (2)	General reporting requirements	Yes.
§ 63.10(d)(3)	Reporting opacity or visible emission observation results	No.
§ 63.10(d)(4)	Progress reports under an extension of compliance	Yes.
§ 63.10(d)(5)	SSM reports	No.*See* § 63.11225 for malfunction reporting requirements.
§ 63.10(e)	Additional reporting requirements for sources with CMS	Yes.
§ 63.10(f)	Waiver of recordkeeping or reporting requirements	Yes.
§ 63.11	Control Device Requirements	No.

§ 63.12	State Authority and Delegation	Yes.
§ 63.13-63.16	Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions	Yes.
§ 63.1(a)(5), (a)(7)-(a)(9), (b)(2), (c)(3)-(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4), 63.10(c)(2)-(4), (c)(9)	Reserved	No.

[76 FR 15591, Mar. 21, 2011, as amended at 78 FR 7521, Feb. 1, 2013]

[40 CFR 63, Subpart JJJJJJ, Table 8

MRRR (Permit Condition 3.21 through 3.23)

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

Permit Condition 3.24 - Monitoring and Recordkeeping

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

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

MRRR (Permit Condition 3.24)

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

Permit Conditions 3.25 through 3.28 - Performance Testing

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

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

- The type of method to be used

- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

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

MRRR (Permit Conditions 3.25 and 3.28)

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

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

Permit Condition 3.29 – Reports and Certifications

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

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

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

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

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

MRRR

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

Permit Condition 3.30 - Incorporation of Federal Requirements by Reference

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

[IDAPA 58.01.01.107, 4/7/11]

MRRR

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

6.2 Emissions Unit-specific Emissions Limits and MRRR

Emissions Unit No. 1- Riley Boiler

Prior permit conditions refer to the permit conditions of the superseded Tier I operating permit issued March 27, 2009.

Permit Condition 4.1

RILEY BOILER EMISSION LIMITS[a]

Source Description	PM/PM_{10}		CO	
	lb/day[b]	T/yr[c]	lb/hr[d]	T/yr[c]
Riley Boiler Stack	432	77.4	57.6	242

MRRR – (permit Condition 4.1)

Permit condition 4.1 is the combined permit conditions of PC 3.1 and PC 3.2 of Permit No. T1-2007-0161 issued February 7, 2007, the prior Tier I operating permit. The value of each of these emission rates remained unchanged. All of the following references to permit conditions (PC) are referring to the conditions stated within Permit No. 2007.0161 issued on February 7, 2007.

Permit Condition 4.2

In accordance with IDAPA 58.01.01.676, the permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.080 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 8% oxygen by volume of wood products

MRRR – (permit Condition 4.2)

PC 4.2 is the prior PC 3.3 and the permit condition content remains unchanged.

Permit Condition 4.3

The boiler shall be fired with woodwaste exclusively.

MRRR – (permit Condition 4.3)

PC 4.3 was the prior PC 4.4. The facility requested to have wood-waste to be changed to biomass. The facility stated in the comments regarding the review of the first draft permit to have woodwaste be maintained and the fuel to be combusted.

Permit Condition 4.4

The boiler shall not produce more than 619.2 million pounds of steam per any consecutive 12-calendar month period

MRRR – (permit Condition 4.4)

PC 4.4 is the prior PC 3.5 and the content of the permit condition remains unchanged.

Permit Condition 4.5

- The permittee shall install, calibrate, maintain and operate, in accordance with the manufacturer's specifications and recommendations, equipment to continuously measure the pressure drop across the wet scrubber and the scrubbing media flow rate to the wet scrubber.
- The wet scrubber shall operate when the boiler operates.
- The wet scrubber shall be maintained in good working order and operated as efficiently as practicable in the Operations and Maintenance (O&M) manual requirements of this permit.

MRRR – (permit Condition 4.5)

Permit condition 4.5 is the combined permit conditions of PC 3.6, PC 3.7, and PC 3.8 of the prior Tier I operating permit. The content of these permit conditions remained unchanged.

New Permit Condition 4.6

The boiler is an existing biomass-fired boiler. This permit condition has two requirements for the boiler regarding the Notification of Compliance Status report. Part b of this permit condition requires the facility to conduct a tune-up of the boiler. Part c required that an energy assessment of the boiler and its energy use systems be completed and submitted.

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

MRRR – (Permit Condition 4.6)

The permit condition describes the applicability of the boiler to the 40 CFR 63 Subpart JJJJJJ program.

Permit Condition 4.7

In accordance with 40 CFR 63.11196(a), the permittee must conduct the initial tune-up no later than March 21, 2014.

[40 CFR 63.11196(a)(1)]

MRRR - (permit Condition 4.7)

This permit condition states the initial reporting date for the Riley boiler to demonstrate compliance with 40 CFR 63.11196(a)(1). Tamarack will perform its initial tune-up and will submit a notice of compliance for the boiler.

Permit Condition 4.8

In accordance with 40 CFR 63 Subpart JJJJJJ, Table 2, the permittee must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include:

- A visual inspection of the boiler or process heater system.
- An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,
- An inventory of major energy consuming systems,

- A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
- A list of major energy conservation measures,
- A list of the energy savings potential of the energy conservation measures identified, and
- A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time for recouping those investments.
- The energy assessment will be 8 on-site technical labor hours in length maximum, but may be longer at the discretion of the owner or operator of the affected source. The boiler system(s) and any on-site energy use system(s) accounting for at least 50 percent of the affected boiler(s) energy (e.g., steam, hot water, or electricity) production, as applicable, will be evaluated to identify energy savings opportunities, within the limit of performing an 8-hour energy assessment.

[40 CFR 63 Subpart JJJJJJ, Table 2, 40 CFR 63.11201(b), 40 CFR 63.11237]

MRRR - (permit Condition 4.8)

This permit conditions states the performances that must be incorporated in the one-time energy assessment that is required to demonstrate compliance with 40 CFR 63 Subpart JJJJJJ, Table 2.

Permit Condition 4.9

In accordance with 40 CFR 63.11205(a), the permittee must operate and maintain the unit in a matter consistent with safety and good air pollution control practices for minimizing emissions.

[40 CFR 63.11205(a)]

MRRR - (permit Condition 4.9)

This permit condition states to demonstrate compliance with CFR 63.11205(a) the permittee must operate and maintain the equipment in safe and with good air pollution control practices.

Permit Condition 4.10

In accordance with 40 CFR 63.11210(c), the permittee must demonstrate initial compliance with the work practice standard and management practice above by dates listed above.

[40 CFR 63.11210(c)]

MRRR - (permit Condition 4.10)

The permit condition states the dates that compliance with the work practice standards and management practices are to be demonstrated. The work practice standards and management practices are stated in Table 2 of Subpart JJJJJJ.

Permit Condition 4.11

In accordance with 40 CFR 63 Subpart JJJJJJ Table 2, the permittee must conduct a tune-up of the boiler biennially, each biennial tune-up specified must be conducted no more than 25 months after the pervious tune-up. The permittee must conduct the tune-up while burning the type of fuel that provided the majority of the heat input to the boiler over the 12 months prior. The management practices in Table 2 of subpart JJJJJJ apply at all times.

[40 CFR 63 Subpart JJJJJJ Table 2, 63.11201(b), (d), 40 CFR 63.11223(a)]

MRRR - (permit Condition 4.11)

This permit condition states the time line for the biennial tune ups to demonstrate compliance with 40 CFR 63 subpart JJJJJJ.

Permit Condition 4.12

In accordance with 40 CFR 63.11223(b), the permittee must conduct a tune-up of the boiler or process heater biennially to demonstrate continuous compliance as follows:

- As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you inspect each burner at least every 36 months);
- Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- Inspect the system controlling the air to fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly;
- Optimize total emissions of carbon monoxide. This optimization should be consistent with manufacturer's specifications, if available;
- Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made), measurements may be taken using a portable CO analyzer; and
- Maintain on-site and submit, if requested by the Administrator, a biennial report containing the following information:
  - The concentrations of carbon monoxide in the effluent stream in part per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler;
  - A description of any corrective actions taken as a part of the combustion adjustment; and
  - The type and amount of fuel used over the 12 month prior to the biennial tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period.
- If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

[40 CFR 63.11223(b)]

MRRR - (permit Condition 4.12)

This permit condition states the process that is included in the tune-up so the boiler biennially can demonstrate compliance. The boiler used at the facility does not have a burner, thus the "as applicable" statement in some of the above mentioned regulations related to the burner are not applicable to the facility.

Permit Condition 4.13

Steam Monitoring and Recordkeeping Requirements

The permittee shall monitor and record the boiler's steam production monthly and annually to demonstrate compliance with the Operation Limit permit condition. Annual boiler steam production shall be determined by summing monthly steam production rates over the previous consecutive 12-calendar month period. Records of this information shall be maintained in accordance with the Recordkeeping in the facility-wide condition section of this permit.

[PTC No. P-2009.0064, 5/31/2011]

MRRR - (permit Condition 4.13)

This permit condition states the monitoring and recording of the steam production to demonstrate compliance with permit conditions of this permit. Permit condition 4.13 is the same as PC 3.9.

Permit Condition 4.14

Wet Scrubber Parametric Monitoring

The permittee shall monitor and record daily and while the boiler is operating, the pressure drop across the wet scrubber and heat exchanger. Records of this information shall be maintained in accordance with the Recordkeeping in the facility-wide condition section of this permit.

[PTC No. P-2009.0064, May 31, 2011]

MRRR – (permit Condition 4.14

The required monitoring of the pressure drop across the wet scrubber and heat exchanger provides assurance the facility is operating within the parameters of the CAM plan and in compliance with the other permit conditions of this permit. This permit condition has been revised from the prior PC 3.10 to coincide with the agreed CAM plan.

Permit Condition 4.15

Operations and Maintenance Manual Requirements

If any changes to the O&M manual are made, an updated manual shall be submitted to DEQ within 15 days of the change. The O&M manual shall be based on the wet scrubber manufacturer's specifications and recommendations and shall describe the methods and procedures that will be followed to assure the wet scrubber is maintained in good working order and operated as efficiently as practical. The O&M manual shall be updated as necessary and shall include, at a minimum, the recommended pressure drop operating range, the recommended scrubbing media flow rate, startup, shutdown, and maintenance procedures, upset conditions, and corrective action procedures. The O&M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-2009.0064, May 31, 2011]

MRRR - (permit Condition 4.15)

This permit condition states the permittee shall have an operation and maintenance manual developed that states the procedures required to maintain the control devices in good working order. PC 4.15 coincides with prior PC 3.11.

Permit Condition 4.16

In accordance with 40 CFR 63.11225(a)(1)-(2), the permittee must submit an initial notification as specified in Section 63.9(b)(2) not later than 120 days after May 20, 2014.

[40 CFR 63.11225(a)(1)-(2)]

MRRR - (permit Condition 4.16)

This permit condition states to demonstrate compliance with the initial notification the permittee must submit the notification no later than 120 days after May 20, 2014.

Permit Condition 4.17

In accordance with 40 CFR 63.11225(b), the permittee must prepare by March 1 of every other year, and submit to the delegated authority upon request, a biennial compliance certification report. If there are any instances of deviations from applicable requirements during the reporting period, the permittee must submit the report by March 15. The report must include the following:

- Company name and address
- Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all relevant standards and other requirements of this subpart
- If the source experiences any deviation from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

[40 CFR 63.11225(b)]

MRRR - (permit Condition 4.17)

This permit condition states the frequency the permittee is required to prepare a biennial compliance certification report and the individual responsible to sign the report. If the material required on the forms for the semi and annual certifications stated in the General Provisions is the same as the required information stated in Permit Condition 4.26, then forms submitted by the facility on January 30th satisfying the General Provisions should also satisfy the request of Permit Condition 4.24.

Permit Condition 4.18

In accordance with 40 CFR 63.11225(c), the permittee must keep the following records:

- Copies of each notification and report submitted to comply with thus subpart and all documentation supporting any Initial Notification or Notification of Compliance Status.
- Records of the date of each tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
- Copy of energy assessment report.
- Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
- Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in Section 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

[40 CFR 63.11225(c)]

MRRR - (permit Condition 4.18)

This permit condition states the records that need be established to demonstrate compliance with Notifications of Compliance, tune-ups, fuel used, and any malfunctions associated with air pollution control and monitoring equipment.

Permit Condition 4.19

In accordance with 40 CFR 63.11225(d), records must be in a form suitable and readily available for expeditious review. Records must be kept for 5 years, two of which must be on-site. Records may be kept off-site for the remaining three years.

[40 CFR 63.11225(d)]

MRRR - (permit Condition 4.19)

This permit condition states the timeline and location the records are to be kept to demonstrate compliance.

Permit Condition 4.20

PM_{10} Performance Test

- A PM_{10} performance test shall be conducted no later than August 16, 2012 and at least once every five years thereafter, the permittee shall conduct a performance test to measure PM_{10} emissions from the boiler stack. The test shall be conducted to demonstrate compliance with the emission rate limits specified by the emission limits and fuel-burning equipment PM standard permit conditions. Each performance test conducted to demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157. Compliance with the daily emissions limit shall be determined by multiplying the average hourly PM_{10} emissions rate measured during the performance test by 24.

- All performance testing shall be conducted in accordance with the Performance Testing in the facility-wide conditions of this permit.

- If the PM_{10} test results are below 75% of the PM_{10} emissions limits listed in the emission limits and fuel-burning equipment PM standard permit conditions, the permittee shall conduct a PM_{10} performance test on the boiler stack at least once every five years from the issuance date of this permit. If the test results are greater than 90% of the PM_{10} emissions limits listed in the emission limits and fuel-burning equipment pm standard permit conditions, the permittee shall conduct a PM_{10} performance test on the boiler stack annually. If the test results are between 75% and 90% of the PM_{10} emissions limits listed in the emission limits and fuel-burning equipment PM standard permit conditions, the permittee shall conduct a PM_{10} performance test on the boiler stack at least once every three years from the issuance date of this permit.

[PTC No. P-2009.0064, May 31, 2011]

MRRR - (permit Condition 4.20)

This permit condition states strongly the need of compliance test protocol 30 days prior to a compliance test. This is helpful for all parties to establish credibility of the test.

Permit Condition 4.21

The permittee must conduct a tune-up and submit a signed statement in the Notification of Compliance Status report that indicates that the tune-up has been completed.

[40 CFR 63.11214(b)]

MRRR - (permit Condition 4.21)

This permit condition states to demonstrate compliance with the Notification of Compliance Status report the tune-up be certified.

Permit Condition 4.22

In accordance with 40 CFR 63.11214(c), the permittee must submit a signed certification in the Notification of Compliance Status report that indicates that an energy assessment of the boiler and energy use system has been completed and submit, upon request, the energy assessment report.

[40 CFR 63.11214(c)]

MRRR - (permit Condition 4.22)

This permit condition states to demonstrate compliance with the Notification of Compliance Status report the energy assessment and the energy use system report be certified.

Permit Condition 4.23

In accordance with 40 CFR 63.11225(a)(4), the permittee must submit a Notification of Compliance Status in accordance with 40 CFR 63.9(h) no later than 120 days after the applicable compliance dates for tune-ups and energy assessment listed above. The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in § 63.13. In addition to the information required in 40 CFR 63.9(h)(2) the notification must include the following statements, as applicable:

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

[40 CFR 63.11225(a) (4)]

MRRR - (permit Condition 4.23)

This permit condition states the time limit for the permittee to submit a Notification of Compliance regarding the tune-up and energy assessment required in this permit.

Permit Condition 4.24

In accordance with 40 CFR 63.11225(b), the permittee must prepare by March 1 of every other year, and submit to the delegated authority upon request, a biennial compliance certification report. If there are any instances of deviations from applicable requirements during the reporting period, the permittee must submit the report by March 15. The report must include the following:

- Company name and address
- Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all relevant standards and other requirements of this subpart
- If the source experiences any deviation from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

[40 CFR 63.11225(b)]

MRRR - (permit Condition 4.24)

This permit condition states the frequency the permittee is required to prepare a biennial compliance certification report and the individual responsible to sign the report. If the material required on the forms for the semi and annual certifications stated in the General Provisions is the same as the required information stated in Permit Condition 4.24, then forms submitted by the facility on January 30th satisfying the General Provisions should also satisfy the request of Permit Condition 4.24.

Emissions Unit No. 2 – Sawdust Target Box and Chip Target Box

Permit Condition 5.1
The daily PM10 emissions from the target box vents shall not exceed 19.2 pound per calendar day.

The annual PM10 emission from the target box vents shall not exceed 3.36 tons per consecutive 12-calendar month period.

MRRR – (Permit Condition 5.1)

Permit condition 5.1 is the combined permit conditions of PC 4.1 and PC 4.2 of the prior Tier I operating permit. The value of each of these emission rates remained unchanged.

Permit Condition 5.2
The permittee shall not produce more than 76.02 million board-feet of lumber per consecutive 12-calendar month period

MRRR – (Permit Condition 5.2)

PC 5.2 is the prior PC 4.3 and the content of the permit condition remains unchanged.

Permit Condition 5.3
The permittee shall monitor and record the annual production of lumber in board-feet at the facility to demonstrate compliance with Throughput Limit permit condition. Records of this information shall be maintained in accordance with the Recordkeeping General Provision.

MRRR – (Permit Condition 5.3)

PC 5.3 is the prior PC 4.4 and the content of the permit condition remains unchanged.

Emissions Unit No. 3 – Emergency Internal Combustion Engine

Permit Condition 6.1
In accordance with IDAPA 58.01.01.728, the permittee shall not sell, distribute, use or make available for use, any distillate fuel oil containing more than 0.5% sulfur by weight.

MRRR – (Permit Condition 6.1)
Fuel Sulfur Content Limit

Permit Condition 6.1 is the prior PC 5.2 the content of the permit condition remains unchanged.

Permit Condition 6.2
The permittee shall not operate the generator for more than 500 hours per any consecutive 12-calendar month period.

MRRR – (Permit Condition 6.2)
Permit Condition 6.2 is the prior PC 5.1, the content of the permit condition remains unchanged.

New Permit Condition 6.3

In accordance with 40 CFR 63.6595(a), the engine identified above must comply with the applicable requirements of NESHAP ZZZZ before May 3, 2013

MRRR – (Permit Condition 6.3)

This permit condition states the engine running the fire pump is applicable to 40 CFR 63 Subpart ZZZZ and shall demonstrate compliance as the requirements apply.

New Permit Condition 6.4

In accordance with 40 CFR 63.6603(e), the permittee shall change the oil and filter every 1000 hours of operation or annually, whichever comes first or at a frequency determined by an oil sample and analysis program as follows

- Sample and analyze the oil annually or every 1000 hours of operation, whichever comes first to determine total base number, viscosity, and water content by volume.
- If one or more of the following condemning limits for these parameters is exceeded then the permittee is required to change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation then the permittee must change the oil within 2 days of receiving the results or before commencing operation, whichever is later.
  - Total Base Number is less than 30% of the Total Base Number when the oil is new.
  - Viscosity of the oil has changed by more than 20% from the viscosity of the oil when new.
  - Percent Water Content (by volume) is greater than 0.5.
- The permittee must keep records of the oil analysis results and the oil and filter changes for the engine.

[40 CFR 63.6603 Table 2d, 40 CFR 63.6603(a), 40 CFR 63.6625(i)]

MRRR - (permit Condition 6.4)

This permit condition states the operational condition that need to be met for the engine to demonstrate compliance with subpart ZZZZ.

Permit Condition 6.5

In accordance with 40 CFR 63.6603 Table 2d, the permittee shall inspect airs cleaners every 1000 hours of operation or annually, whichever comes first.

[40 CFR 63.6603 Table 2d, 40 CFR 63.6603(a)]

MRRR - (permit Condition 6.5)

This permit condition demonstrates compliance with 40 CFR 63 subpart ZZZZ regarding the air cleaner requirement stated in Table 2d.

Permit Condition 6.6

In accordance with 40 CFR 63.6603 Table 2d, the permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6603 Table 2d, 40 CFR 63.6603(a)]

MRRR - (permit Condition 6.6)

This permit condition demonstrate compliance with 40 CFR 63 subpart ZZZZ regarding the hoses and belts requirement stated in Table 2d.

Permit Condition 6.7

In accordance with 40 CFR 63.6625(e), the permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must ensure, to the extent practicable, the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e)]

MRRR - (permit Condition 6.7)

This permit condition states the procedure for operation and maintenance of the RICE will be either in accordance with the manufacturer's written instructions or with the facility determined maintenance plan to maintain the good air pollution control practice for minimizing emissions.

Permit Condition 6.8

In accordance with 40 CFR 63.6625(h), the permittee must minimize the engine's time spent at idle and at startup to a period needed for appropriate and safe loading, not to exceed 30 minutes, after which time the non-startup emissions limitations apply.

[40 CFR 63.6625(h)]

MRRR - (permit Condition 6.8)

This permit condition states the practices the permittee shall be using for idle and startup period. These periods are not to exceed a time limit of 30 minutes.

Permit Condition 6.9

In accordance with 40 CFR 63.6605(a-b), the permittee must be in compliance with the preceding management practice standards at all times as well as maintaining and operating any affected source in a manner consistent with safety and good air pollution control.

[40 CFR 63.6605(a-b]

MRRR - (permit Condition 6.9)

This permit condition states the permittee shall maintain good air pollution control practices with the RICE but maintain safety and good air pollution control practices with any affected source.

Permit Condition 6.10

In accordance with 40 CFR 63.6640(a), the permittee must demonstate compliance with the preceding management practice standards by operating and maintaining the stationary RICE according to the manufacturer's emission-related instructions or by developing and following their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice.

[40 CFR 63.6640(a), Table 6]

MRRR - (permit Condition 6.10)

This permit condition states the permittee shall maintain the management practice standards according to the manufacturer's instructions or by their own maintenance plan in a manner consistent with good air pollution control practice.

New Permit Condition 6.11

In accordance with 40 CFR 63.6640(e), each instance in which the unit did not meet the requirements of the applicable general provisions listed in Table 8 of this subpart must be recorded.

[40 CFR 63.6640(e)]

MRRR - (permit Condition 6.11)

This permit conditions states the reporting of any requirement(s) of Table 8 of the applicable general provisions in Table 8 not met.

Permit Condition 6.12

In accordance with 40 CFR 63.6655(e), if the permittee follows their own maintenance plan rather than the manufacturer's written instructions they must keep records of maintenance conducted on the stationary RICE.

[40 CFR 63.6655(e)]

MRRR - (permit Condition 6.12)

This permit condition states if the permittee operates the RICE under their own maintenance plan, the permittee must keep records of the maintenance.

Permit Condition 6.13

The permittee shall maintain documentation of the fuel oil sulfur content from the fuel oil supplier or refinery providing the fuel oil on an as received basis to demonstrate compliance with the Fuel Sulfur Content Limit permit condition. Records of this information shall be maintained in accordance with the Recordkeeping requirement stated in the facility-wide conditions of this permit.

MRRR – (Permit Condition 6.13)

Permit Condition 6.13 is the prior PC 5.3 and the content of the permit condition remains unchanged.

Permit Condition 6.14

The permittee shall monitor and record monthly and annually the operating hours for the engine to demonstrate compliance with the Hours of Operation Limit permit condition. Annual operating hours shall be determined by summing monthly operating hours over the previous consecutive 12-calendar month period. Records of this information shall be maintained in accordance with the Recordkeeping General Provision.

MRRR – (Permit Condition 6.14)

Permit Condition 6.14 is the prior PC 5.4 and the content of the permit condition remains unchanged.

Permit Condition 6.15

In accordance with 40 CFR 63.6640(b), the permittee must report each instance of deviation from the management practice standards.

[40 CFR 63.6640(b)]

MRRR - (permit Condition 6.15)

This permit condition states the permittee must maintain in a report of any deviation from the management practice standards.

Permit Condition 6.16

In accordance with 40 CFR 63.6645(a)(5), the permittee is subject to the General Requirements provided in Table 8 except for the notification requirements of 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

[40 CFR 63.6665, 63.6645(a)(5)]

MRRR - (permit Condition 6.16)

This permit conditions states the permittee is subject to the General Requirements within Table 8 with exception stated in the permit condition.

Emissions Unit No. 4 – Lumber Drying Kilns (No. 1, 2, 3, 4, 5, and 6)

All the permit conditions within section 6 of this Tier I operating permit were not in the prior Tier I operating permit. The PTC for the facility regarding the installation of the lumber drying kilns was issued on November 4, 2009. The PTC for the lumber drying kilns and a PTC/T2 issued for compliance of the prior Tier I operating permit were replaced by a PTC P-2009.0064 project 60856 issued on May 31, 2011, thus incorporated within this Tier I operation permit. Tamarack was issued a permit P-2009.0064 project 61224 for the construction of three additional kilns on December 13, 2013. The permit conditions described below incorporates the permit conditions of that permitting action.

Permit Condition 7.1 and 7.2

Criteria Pollutant Emissions Limits
The total PM_{10} and VOC emissions from the three lumber drying kilns (No. 1 through 6) stacks shall not exceed any corresponding emissions rate limits listed in the table below.

Table 0.1 LUMBER DRYING KILNS EMISSION LIMITS[a]

Source Description	PM_{10}		VOC	
	lb/hr	T/yr[2]	lb/hr	T/yr[2]
Lumber Drying Kilns (No.1 through 6)	0.62	1.9	N/A	60.4

1. In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
2. Tons per any consecutive 12-calendar month period.

MRRR – (Permit Condition 7.1and 7.2)

Permit condition 7.1 and 7.2 is Permit Condition 31 in the PTC project 60856 issued May 31, 2011. The content of PC 31 was unchanged in this permit and established the emission limits of PM_{10} and VOCs for the facility. However the permitting of the three additional kilns in P-2009.0064 project 61224 increased the PM_{10} hourly emissions to 0.62 pounds.

Permit Condition 7.3

TAPs Emissions Limits
The total acetaldehyde emissions from the three lumber drying kilns (No. 1 through 6) stacks shall not exceed 5.5 tons per any consecutive 12-month period (5.5 T/yr).

MRRR – (Permit Condition 7.3)

Permit condition 7.3 is permit condition 32 in the PTC project 60856. The content of PC 32 was unchanged in this permit and established the emission limits of the total TAPs to be emitted for the kilns per a 12-month consecutive period for the facility.

Permit Condition 7.4

Throughput Limit
The total throughput through the lumber drying kilns (No. 1 through 6) shall not exceed 76.0 million board feet per any consecutive 12-month period (76.0 MMbf/yr).

MRRR – (Permit Condition 7.4)

Permit condition 7.4 is permit condition 33 in the PTC project 60856. The content of PC 33 was unchanged in this permit and established the maximum throughput of lumber in the kilns per year that would generated the PM_{10}, VOC and TAPs emission limits permit conditions 7.1 through7.3.

Permit Condition 7.5

Operating Temperature Limit
The operating temperature (dry bulb temperature) of the three lumber drying kilns (No. 1 through 6) shall not exceed 200 °F.

MRRR – (Permit Condition 7.5)

Permit condition 7.4 is permit condition 34 in the PTC project 60856. The content of PC 34 was unchanged in this permit and established the maximum temperature the kilns can operate to keep the VOC and TAPs emission at or below the limits stated in the prior permit conditions.

Permit Condition 7.6

No Hemlock shall be dried in any of the kilns.

MRRR – (Permit Condition 7.6)

The drying of Hemlock produced emissions when modeled would exceed the NAAQS standards for the amount of lumber throughput requested by the facility. Thus the processing of Hemlock is prohibited from the drying kilns.

Permit Condition 7.7

Throughput Monitoring
The permittee shall monitor and record the throughput through each lumber drying kiln monthly and annually to demonstrate compliance with the throughput limit. Annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-month period.

MRRR – (Permit Condition 7.7)

Permit condition 7.7 is permit condition 35 in the PTC project 60856. The content of PC 35 was unchanged in this permit. Permit Condition 7.7 establishes the recording and frequency of the records covering permit condition 7.4 of this permit. This monitoring and recording are required to determine compliance with permit conditions 7.1 through 7.3.

Permit Condition 7.8

Operating Temperature Monitoring
The permittee shall monitor and record the maximum dry bulb temperature at which the lumber drying kilns (No. 1 through 6) are operated once per kiln charge when the kilns are operating. Records shall show compliance with the operating temperature permit condition.

MRRR – (Permit Condition 7.6)

Permit condition 7.6 is permit condition 36 in the PTC project 60856. The content of PC 36 was

unchanged in this permit. Permit Condition 7.6 establishes the recording and frequency of the records covering permit condition 7.4 of this permit. This monitoring and recording are required to determine compliance with permit conditions 7.2 and 7.4.

Permit Condition 7.9

Recordkeeping
The permittee shall comply with the recordkeeping requirements of the Recordkeeping General Provision.

MRRR – (Permit Condition 7.9)

Permit condition 7.7 correlates the information requirement to meet the recordkeeping requirement stated within the General Provisions. PC 7.9 is the permit condition 37 in the PTC project 60856 with no changes.

40 CFR 64 – Compliance and Assurance Monitoring

This section is design to demonstrate the parameters of operations for the air pollution control device(s) that demonstrated continued compliance with the conditions of the permit regarding the boiler.

Permit Condition 8.1

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

MRRR – (Permit Condition 8.1)

This permit condition is self-explanatory.

Permit Condition 8.2
In accordance with 40 CFR 64.7(b), at all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

MRRR – (Permit Condition 8.2)

This permit condition states Tamarack is to maintain necessary part for the routine repairs of monitoring equipment used to demonstrate continuous compliance with the permit conditions.

Permit Condition 8.3

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

MRRR – (Permit Condition 8.3)

This permit condition defines monitoring malfunction. This permit condition instructs Tamarack the data obtained during the malfunctioning period can't be used to satisfy the purposed of CAM.

Permit Condition 8.4

In accordance with 40 CFR 64.7(d), upon detecting an excursion or exceedance, the permittee shall restore operation of the Yanke Energy Hog-Fuel 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.

MRRR – (Permit Condition 8.4)

This permit condition instructs Tamarack when an excursion or exceedance occurs Tamarack is to restore the operation to its normal operation manner as expeditiously as practicable. This permit condition instructs Tamarack with possibilities to reduce the possibility of Tamarack operating outside of the ranges stated with this permit to demonstrate compliance.

Permit Condition 8.5

In accordance with 40 CFR 63(b), for the multiclone in series with a wet scubber, if the manufacturer specifications for the monitoring devices for the pressure drop and heat exchanger include calibration procedures but do not specify a calibration frequency, the device shall be calibrated at least once each calendar year.

MRRR – (Permit Condition 8.5)

This permit condition specifies the appropriate frequency that calibration shall be performed on the monitoring devices used to demonstrate compliance with the permit conditions stated in the permit.

Permit Condition 8.6

In accordance with 40 CFR 64.6(c)(2), an exceedance shall be defined as any measured emission of Pollutant PM_{10} which exceeds any corresponding emissions limit specified for the emissions unit in the permit.

MRRR – (Permit Condition 8.6)

The means by which the owner or operator will define an exceedance or excursion for purposes of responding to and reporting exceedances or excursions under sections 64.7 and 64.8 of this part. The permit shall specify the level at which an excursion or exceedance will be deemed to occur, including the appropriate averaging period associated with such exceedance or excursion. For defining an excursion from an indicator range or designated condition, the permit may either include the specific

value(s) or condition(s) at which an excursion shall occur, or the specific procedures that will be used to establish that value or condition. If the latter, the permit shall specify appropriate notice procedures for the owner or operator to notify the permitting authority upon any establishment or reestablishment of the value. These values were submitted by Tamarack as the appropriate values for determining continuous compliance with the permit conditions.

Permit Condition 8.7

In accordance with 40 CFR 64.7(e), if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to 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.

MRRR – (Permit Condition 8.7)

Permit Condition 8.7 addresses the issue if or when Tamarack fails to achieve compliane with the emission limit or standard set by this permit. This permit condition provides various methods that exceedances or excursions can be addressed to provide the facility method to demonstrate compliance with all permit conditions as stated in the permit.

Permit Condition 8.8

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

MRRR – (Permit Condition 8.8)

Permit condition 8.8 states the procedure required if or when Tamarack's accumulation of exceedances or excursions exceeds 5 percent duration of the boiler's operating time for a reporting period.

Permit Condition 8.9

In accordance with 40 CFR 64.9(a)(2), the reports required by the Semiannual Monitoring Reports and Reporting Deviations and Excess Emissions General Provisions shall include the following information for those emissions units listed in Table 11.1:

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

MRRR – (Permit Condition 8.9)

Permit Condition 7.9 contains the informational data required in the reports for Tamarack to demonstrate compliance with the regulation of 40 CFR 64.9(a)(2).

Permit Condition 8.10

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

MRRR – (Permit Condition 8.10)

Permit Condition 8.10 contains the informational data required in the records for Tamarack to demonstrate compliance with the regulation of 40 CFR 64.9(b).

Permit Condition 8.11

Should there be a conflict between the requirements of 40 CFR 64 and any of the CAM permit conditions of this permit, the requirements of the 40 CFR 64 shall govern, including any amendments to that regulation.

MRRR – (Permit Condition 8.11)

Permit Condition 8.11 states clearly in case of a conflict with the federal regulation within 40 CFR 64 and any CAM permit condition the requirements of 40 CFR 64 shall be the governing requirement to demonstrate compliance.

7 General Provisions

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

General Provision 1 – General Compliance, Duty to Comply

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

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

General Provision 2 – General Compliance, Need to Halt or Reduce Activity Not a Defense

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

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

General Provision 3 – General Compliance, Duty to Supplement or Correct Application

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

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

General Provision 4 – Reopening, Additional Requirements, Material Mistakes, Etc.

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or

revocation is necessary to assure compliance with applicable requirements.

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

General Provision 5 – Reopening, Permitting Actions

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

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

General Provision 6 – Property Rights

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

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

General Provision 7 – Information Requests

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

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

General Provision 8 – Information Requests, Confidential Business Information

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

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

General Provision 9 - Severability

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

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

General Provision 10 – Changes Requiring Permit Revision or Notice

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

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

General Provision 11 – Changes Requiring Permit Revision or Notice.

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01. 383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

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

General Provisions 12 and 13 – Federal and State Enforceability

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

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

General Provision 14 – Inspection and Entry

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

a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;

b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

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

General Provision 15 – New Requirements During Permit Term

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

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

General Provision 16 - Fees

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

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

General Provision 17 – Certification

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

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

General Provision 18 – Renewal

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

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

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

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

General Provision 19 – Permit Shield

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

a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or

   i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.

b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).

c. Nothing in this permit shall alter or affect the following:

   i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;

   ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

   iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and

   iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

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

General Provision 20 – Compliance Schedule and Progress Reports.

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

b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.

c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

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

General Provision 21 – Periodic Compliance Certification

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

a. The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit.

b. The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;

c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):

   i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;

   ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;

   iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii. above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and

   iv. Such information as the Department may require to determine the compliance status of the emissions unit.

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

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

General Provision 22 – False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

General Provision 23 – No Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

General Provision 24 – Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, Tamarack Mills shall submit reports of any required monitoring at least every six months. Tamarack Mills' semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 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 30 days of the end of the specified reporting period.

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

General Provision 25 – Reporting Deviations and Excess Emissions

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

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

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

General Provision 26 – Permit Revision Not Required, Emissions Trading

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

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

General Provision 27 - Emergency

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

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

6. REGULATORY REVIEW

6.1 Attainment Designation (40 CFR 81.313)

The facility is located in Adams which is designated as attainment or unclassifiable for PM_{10}, $PM_{2.5}$, CO, NO_2, SO_X, and Ozone. Reference 40 CFR 81.313.

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

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit
Post project facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for CO as demonstrated previously in the Emissions Inventories Section of analyses of July 27, 2007 and November 4, 2009. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10.

6.3 PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality
The facility is classified as an existing major stationary source, because the estimated emissions of PM_{10}, SO_2, NO_X, CO, VOC, and HAP have the potential to exceed major stationary source thresholds.

The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a). This facility is not a major source as defined to have potential emissions that exceed 250 tons per year of a criteria pollutant. The PSD classification does not apply to this facility.

6.4 NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements.

6.5 NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

6.6 MACT Applicability (40 CFR 63)

Tamarack has a stationary reciprocating internal combustion engine and an industrial boiler that is an area source for hazardous air pollutants. Thus Tamarack is applicable to standards of 40 CFR 63.

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

- 40 CFR 63, Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

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

§ 63.6580 What is the purpose of subpart ZZZZ?

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

§ 63.6585 Am I subject to this subpart?

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

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

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

(c) An area source of HAP emissions is a source that is not a major source.

(d) If you are an owner or operator of an area source subject to this subpart, your status as an entity subject to a standard or other requirements under this subpart does not subject you to the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart as applicable.

(e) If you are an owner or operator of a stationary RICE used for national security purposes, you may be eligible to request an exemption from the requirements of this subpart as described in 40 CFR part 1068, subpart C.

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

This subpart applies to each affected source.

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

(1) Existing stationary RICE.

(i) For stationary RICE with a site rating of more than 500 brake horsepower (HP) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.

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

(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

(iv) A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

(2) New stationary RICE. (i) A stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after December 19, 2002.

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

(iii) A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

(3) Reconstructed stationary RICE. (i) A stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after December 19, 2002.

(ii) A stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.

(iii) A stationary RICE located at an area source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.

(b) Stationary RICE subject to limited requirements. (1) An affected source which meets either of the criteria in paragraphs (b)(1)(i) through (ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(f).

(i) The stationary RICE is a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions.

(ii) The stationary RICE is a new or reconstructed limited use stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions.

(2) A new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis must meet the initial notification requirements of §63.6645(f) and the requirements of §§63.6625(c), 63.6650(g), and 63.6655(c). These stationary RICE do not have to meet the emission limitations and operating limitations of this subpart.

(3) The following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements:

(i) Existing spark ignition 2 stroke lean burn (2SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;

(ii) Existing spark ignition 4 stroke lean burn (4SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;

(iii) Existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;

(iv) Existing limited use stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;

(v) Existing stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;

(vi) Existing residential emergency stationary RICE located at an area source of HAP emissions;

(vii) Existing commercial emergency stationary RICE located at an area source of HAP emissions; or

(viii) Existing institutional emergency stationary RICE located at an area source of HAP emissions.

(c) Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

(1) A new or reconstructed stationary RICE located at an area source;

(2) A new or reconstructed 2SLB stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(3) A new or reconstructed 4SLB stationary RICE with a site rating of less than 250 brake HP located at a major source of HAP emissions;

(4) A new or reconstructed spark ignition 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(5) A new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;

(6) A new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(7) A new or reconstructed compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.

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

(a) Affected sources. (1) If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than June 15, 2007. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. If you have an existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

(2) If you start up your new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions before August 16, 2004, you must comply with the applicable emission limitations and operating limitations in this subpart no later than August 16, 2004.

(3) If you start up your new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions after August 16, 2004, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.

(4) If you start up your new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions before January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart no later than January 18, 2008.

(5) If you start up your new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions after January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.

(6) If you start up your new or reconstructed stationary RICE located at an area source of HAP emissions before January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart no later than January 18, 2008.

(7) If you start up your new or reconstructed stationary RICE located at an area source of HAP emissions after January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.

(b) Area sources that become major sources. If you have an area source that increases its emissions or its potential to emit such that it becomes a major source of HAP, the compliance dates in paragraphs (b)(1) and (2) of this section apply to you.

(1) Any stationary RICE for which construction or reconstruction is commenced after the date when your area source becomes a major source of HAP must be in compliance with this subpart upon startup of your affected source.

(2) Any stationary RICE for which construction or reconstruction is commenced before your area source becomes a major source of HAP must be in compliance with the provisions of this subpart that are applicable to RICE located at major sources within 3 years after your area source becomes a major source of HAP.

(c) If you own or operate an affected source, you must meet the applicable notification requirements in §63.6645 and in 40 CFR part 63, subpart A.

§ 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this subpart.

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 1b and Table 2b to this subpart that apply to you.

(b) If you own or operate an existing stationary non-emergency CI RICE greater than 300 HP located at area sources in areas of Alaska not accessible by the Federal Aid Highway System (FAHS) you do not have to meet the numerical CO emission limitations specified in Table 2d to this subpart. Existing stationary non-emergency CI RICE greater than 300 HP located at area sources in areas of Alaska not accessible by the FAHS must meet the management practices that are shown for stationary non-emergency CI RICE less than or equal to 300 HP in Table 2d to this subpart.

As stated in §63.6603, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

Table 2d to Subpart ZZZZ of Part 63 — Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

For Each	You Must Meet the Following Operating Limitation	During periods of startup you must . . .
4. Emergency stationary CI RICE and black start stationary CI RICE.[2]	**a. Change oil and filter every 500 hours of operation or annually, whichever comes first;[1]** **b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;** **c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.**	**Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.**

[1] Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.

[2] If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

Permit Condition 6.3 includes the requirements of this section.

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

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

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

Permit Condition 6.7 includes the requirements of this section.

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

(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:

(2) An existing emergency or black start stationary RICE with a site rating of less than or equal to 500 HP located at a major source of HAP emissions;

Permit Condition 6.8 includes the requirements of this section.

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

Permit Condition 6.8 includes the requirements of this section.

(h) If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's

time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

Permit Conditions 6.8 includes the requirements of this section.

(i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

Permit Conditions 6.8 includes the requirements of this section.

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

(f) Requirements for emergency stationary RICE. (1) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that was installed on or after June 12, 2006, or an existing emergency stationary RICE located at an area source of HAP emissions, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.

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

(ii) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.

(iii) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.

Permit Conditions 6.8 includes the requirements of this section.

§ 63.6645 What notifications must I submit and when?

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

(2) An existing stationary RICE located at an area source of HAP emissions.

Permit Condition 3.22 includes the requirements of this section.

§ 63.6655 What records must I keep?

(a) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).

(2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

(3) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).

(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

Permit Conditions 6.10 includes the requirements of this section.

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

(1) An existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions.

(2) An existing stationary emergency RICE.

(3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

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

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

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

Permit Conditions 6.10 includes the requirements of this section.

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

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

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

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

Permit Conditions 6.11 includes the requirements of this section.

40 CFR 63, Subpart JJJJJJ **National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources**

§ 63.11193 Am I subpart to this subpart?

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

§ 63.11194 What is the affected source of this subpart?

(a) This subpart applies to each new, reconstructed, or existing affected source as defined in paragraphs (a)(1) and (2) of this section.

(1) The affected source is the collection of all existing industrial, commercial, and institutional boilers within a subcategory (coal, biomass, oil), as listed in §63.11200 and defined in §63.11237, located at an area source.

(2) The affected source of this subpart is each new or reconstructed industrial, commercial, or institutional boiler within a subcategory, as listed in §63.11200 and as defined in §63.11237, located at an area source.

(b) An affected source is an existing source if you commenced construction or reconstruction of the affected source on or before June 4, 2010.

§ 63.11196 What are my compliance dates?

(a) If you own or operate an existing affected boiler, you must achieve compliance with the applicable provisions in this subpart as specified in paragraphs (a)(1) through (3) of this section.

(1) If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management standard no later than March 21, 2012.

(2) If the existing affected boiler is subject to emission limits, you must achieve compliance with the emission limits no later than March 21, 2014.

(3) If the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014.

(b) If you start up a new affected source on or before May 20, 2011, you must achieve compliance with the provisions of this subpart no later than May 20, 2011.

(c) If you start up a new affected source after May 20, 2011, you must achieve compliance with the provisions of this subpart upon startup of your affected source.

(d) If you own or operate an industrial, commercial, or institutional boiler and would be subject to this subpart except for the exemption in §63.11195(b) for commercial and industrial solid waste incineration units covered by 40 CFR part 60, subpart CCCC or subpart DDDD, and you cease combusting solid waste, you must be in compliance with this subpart on the effective date of the waste to fuel switch.

Permit condition 4.7 and 4.8

§ 63.11200 What are the subcategories of boilers?

The subcategories of boilers are coal, biomass, and oil. Each subcategory is defined in §63.11237.

§ 63.11201 What standards must I meet?

(a) You must comply with each emission limit specified in Table 1 to this subpart that applies to your boiler.

(b) You must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after January 1, 2008 that meets the requirements in Table 2 to this subpart satisfies the energy assessment portion of this requirement.

(c) You must comply with each operating limit specified in Table 3 to this subpart that applies to your boiler.

(d) These standards apply at all times.

Table 2 to Subpart JJJJJJ of Part 63 — Work Practice Standards, Emission Reduction Measures, and Management Practices

For Each	You must meet the following. . .
1. If your boiler is in this subcategory. . .	Minimize the boiler's startup and shutdown periods following the manufacturer's recommended procedures. If manufacturer's recommended procedures are not available, you must follow recommended procedures for a unit of similar design for which manufacturer's recommended procedures are available.
2. Existing or new coal (units with heat input capacity of less than 10 million Btu per hour)	Conduct a tune-up of the boiler biennially as specified in §63.11223.
3. Existing or new biomass or oil	Conduct a tune-up of the boiler biennially as specified in §63.11223.
4. Existing coal, biomass, or oil (units with heat input capacity of 10 million Btu per hour and greater)	Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. The energy assessment must include: (1) A visual inspection of the boiler system, (2) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints, (3) Inventory of major systems consuming energy from affected boiler(s), (4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage, (5) A list of major energy conservation measures, (6) A list of the energy savings potential of the energy conservation measures identified, (7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

PTC Permit Condition 4.9, 4.12, 4.13, includes the requirements of this section.

§ 63.11205 What are my general requirements for complying with this subpart?

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

Permit Condition 4.10, 4.17, 3.23

(b) You can demonstrate compliance with any applicable mercury emission limit using fuel analysis if the emission rate calculated according to §63.11211(c) is less than the applicable emission limit. Otherwise, you must demonstrate compliance using stack testing.

(c) If you demonstrate compliance with any applicable emission limit through performance stack testing and subsequent compliance with operating limits (including the use of continuous parameter monitoring system), with a CEMS, or with a COMS, you must develop a site-specific monitoring

plan according to the requirements in paragraphs (c)(1) through (3) of this section for the use of any CEMS, COMS, or continuous parameter monitoring system. This requirement also applies to you if you petition the EPA Administrator for alternative monitoring parameters under §63.8(f).

(1) For each continuous monitoring system required in this section (including CEMS, COMS, or continuous parameter monitoring system), you must develop, and submit to the delegated authority for approval upon request, a site-specific monitoring plan that addresses paragraphs (c)(1)(i) through (vi) of this section. You must submit this site-specific monitoring plan, if requested, at least 60 days before your initial performance evaluation of your CMS. This requirement to develop and submit a site specific monitoring plan does not apply to affected sources with existing monitoring plans that apply to CEMS and COMS prepared under appendix B to part 60 of this chapter and which meet the requirements of §63.11224.

(i) Installation of the continuous monitoring system sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device);

(ii) Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems; and

(iii) Performance evaluation procedures and acceptance criteria (e.g., calibrations).

(iv) Ongoing operation and maintenance procedures in accordance with the general requirements of §63.8(c)(1)(ii), (c)(3), and (c)(4)(ii);

(v) Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d); and

(vi) Ongoing recordkeeping and reporting procedures in accordance with the general requirements of §63.10(c) (as applicable in Table 8 to this subpart), (e)(1), and (e)(2)(i).

(2) You must conduct a performance evaluation of each CMS in accordance with your site-specific monitoring plan.

(3) You must operate and maintain the CMS in continuous operation according to the site-specific monitoring plan.

Permit Condition 4.11

§63.11214 How do I demonstrate initial compliance with the work practice standard, emission reduction measures, and management practice?

(a) If you own or operate an existing or new coal-fired boiler with a heat input capacity of less than 10 million Btu per hour, you must conduct a performance tune-up according to §63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

(b) If you own or operate an existing or new biomass-fired boiler or an existing or new oil-fired boiler, you must conduct a performance tune-up according to §63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

(c) If you own or operate an existing affected boiler with a heat input capacity of 10 million Btu per hour or greater, you must submit a signed certification in the Notification of Compliance Status

report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 to this subpart and is an accurate depiction of your facility.

(d) If you own or operate a boiler subject to emission limits in Table 1 of this subpart, you must minimize the boiler's startup and shutdown periods following the manufacturer's recommended procedures, if available. If manufacturer's recommended procedures are not available, you must follow recommended procedures for a unit of similar design for which manufacturer's recommended procedures are available. You must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available.

Permit Conditions 4.22, and 4.23

§63.11225 What are my notification, reporting, and recordkeeping requirements?

(a) You must submit the notifications specified in paragraphs (a)(1) through (5) of this section to the administrator.

(1) You must submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of this section.

(2) An Initial Notification must be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard.

(3) If you are required to conduct a performance stack test you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance stack test is scheduled to begin.

(4) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196 unless you must conduct a performance stack test. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official.

(i) You must submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). If you conduct any performance tests or CMS performance evaluations, you must submit that data as specified in paragraph (e) of this section. If you conduct any opacity or visible emission observations, or other monitoring procedures or methods, you must submit that data to the Administrator at the appropriate address listed in §63.13.

(ii) "This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler."

(iii) "This facility has had an energy assessment performed according to §63.11214(c)."

(iv) For units that install bag leak detection systems: "This facility complies with the requirements in §63.11224(f)."

(v) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

(vi) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in §63.13.

(5) If you are using data from a previously conducted emission test to serve as documentation of conformance with the emission standards and operating limits of this subpart, you must include in the Notification of Compliance Status the date of the test and a summary of the results, not a complete test report, relative to this subpart.

(b) You must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of this section. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section. For boilers that are subject only to a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section.

(1) Company name and address.

(2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(i) "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."

(ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of

the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

(iii) "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

(3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

(4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

(c) You must maintain the records specified in paragraphs (c)(1) through (7) of this section.

(1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

(2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this section.

(i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.

(ii) For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1) of this chapter, you must keep a record which documents how the secondary material meets each of the legitimacy criteria under §241.3(d)(1). If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4) of this chapter, you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2 and each of the legitimacy criteria in §241.3(d)(1) of this chapter. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c) of this chapter, you must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per §241.4, you must keep records documenting that the material is a listed non-waste under §241.4(a).

(iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.

(iv) For each boiler subject to an emission limit in Table 1 to this subpart, you must also keep records of monthly fuel use by each boiler, including the type(s) of fuel and amount(s) used.

(v) For each boiler that meets the definition of seasonal boiler, you must keep records of days of operation per year.

(vi) For each boiler that meets the definition of limited-use boiler, you must keep a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent and records of fuel use for the days the boiler is operating.

(3) For sources that demonstrate compliance through fuel analysis, a copy of all calculations and supporting documentation that were done to demonstrate compliance with the mercury emission limits. Supporting documentation should include results of any fuel analyses. You can use the results from one fuel analysis for multiple boilers provided they are all burning the same fuel type.

(4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

(6) You must keep the records of all inspection and monitoring data required by §§63.11221 and 63.11222, and the information identified in paragraphs (c)(6)(i) through (vi) of this section for each required inspection or monitoring.

(i) The date, place, and time of the monitoring event.

(ii) Person conducting the monitoring.

(iii) Technique or method used.

(iv) Operating conditions during the activity.

(v) Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that monitoring indicated proper operation.

(vi) Maintenance or corrective action taken (if applicable).

(7) If you use a bag leak detection system, you must keep the records specified in paragraphs (c)(7)(i) through (iii) of this section.

(i) Records of the bag leak detection system output.

(ii) Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings.

(iii) The date and time of all bag leak detection system alarms, and for each valid alarm, the time you initiated corrective action, the corrective action taken, and the date on which corrective action was completed.

(d) Your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years.

(e)(1) Within 60 days after the date of completing each performance test (defined in §63.2) as required by this subpart you must submit the results of the performance tests, including any associated fuel analyses, required by this subpart to EPA's WebFIRE database by using CEDRI that is accessed through EPA's CDX (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/index.html). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk or other commonly used electronic storage media (including, but not limited to, flash drives) to EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, you must also submit these reports, including CBI, to the delegated authority in the format specified by the delegated authority. For any performance test conducted using test methods that are not listed on the ERT Web site, the owner or operator shall submit the results of the performance test in paper submissions to the Administrator at the appropriate address listed in §63.13.

(2) Within 60 days after the date of completing each CEMS performance evaluation test as defined in §63.2, you must submit relative accuracy test audit (RATA) data to EPA's CDX by using CEDRI in accordance with paragraph (e)(1) of this section. Only RATA pollutants that can be documented with the ERT (as listed on the ERT Web site) are subject to this requirement. For

any performance evaluations with no corresponding RATA pollutants listed on the ERT Web site, the owner or operator shall submit the results of the performance evaluation in paper submissions to the Administrator at the appropriate address listed in §63.13.

(f) If you intend to commence or recommence combustion of solid waste, you must provide 30 days prior notice of the date upon which you will commence or recommence combustion of solid waste. The notification must identify:

(1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will commence burning solid waste, and the date of the notice.

(2) The currently applicable subcategory under this subpart.

(3) The date on which you became subject to the currently applicable emission limits.

(4) The date upon which you will commence combusting solid waste.

(g) If you have switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within subpart JJJJJJ, in the boiler becoming subject to subpart JJJJJJ, or in the boiler switching out of subpart JJJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to subpart JJJJJJ, you must provide notice of the date upon which you switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:

(1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.

(2) The date upon which the fuel switch, physical change, or permit limit occurred.

These federal regulations are cited with the Permit Conditions 4.17, 4.18, 4.19, 4.20, 4.24, 4.25, and 4.26.

6.7 CAM Applicability (40 CFR 64)

Individual permit units at facilities that are subject to Tile V permitting requirements (Tier I permits) may be subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). 40 CFR Part 64 requires CAM for units that meet the following three criteria:

1) The unit must have an emission limit for the pollutant;
2) The unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
3) The unit must have a pre-control potential to emit of greater than the major source thresholds.

At this facility the Cogeneration Boiler, has an emissions limit as well as add-on controls for PM_{10} emissions. As part of this project the facility submitted CAM operational procedures and limits. These are stated in Table 8.1 of the permit. Permit Conditions 8.1 through 8.11 states the recordkeeping that Tamarack will be doing to demonstrate continuous compliance with the 40 CFR 64.

6.8 Acid Rain Permit (40 CFR 72-75)

Tamarack is not subject to 40 CFR 72-75.

7. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period will be made available to the public. During this time, comments **will or will not be** submitted in response to DEQ's proposed action

8. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on September 17, 2014 via e-mail. EPA Region 10 did not respond thus defaulted to allow the permit to for final.

Appendix A – Emissions Inventory

While several of the emissions inventory has remained unchanged from prior permitting actions those permits which address the emission inventory are listed below:

P-2009.0064
Tier II/PTC T2-050047
T1-2007.0161

Appendix B – Facility Comments for Draft Permit

DEQ Reponses to Comments Received from Tamarack on April 9, 2014

These comments were color coded as blue for conversation, green for clarification and discussion, and red for proposed elimination. The response to the comments will state the color of the comments and the response . The numbering stated in this response section are those of the original draft permit.

Comment No. 1

The facility asked to have the duplication in PC 3.21be removed. (RED)

DEQ Response

The duplication was removed.

Comment No. 2

The facility as that the table 3.4 of PC 3.22 be removed from the permit. (RED)

DEQ Response

The table was removed from the permit to help eliminate any confusion about which requirements are applicable to the facility. However the table was put in the SOB so the facility would have a quick reference to the requirements that are applicable to the facility. The SOB is a support document for the Permit Conditions stated within the permit.

Comment No. 3

The facility asked for the first part of the first sentence in PC 3.23 be removed to avoid confusion. (RED)

DEQ Response

The first sentence in PC 3.23 was reworded to state "The permittee owns or operates an existing stationary boiler located at an area source of HAP emissions, the permittee must comply with the requirements in Table 2d for 40 CFR Part 63 subpart JJJJJJ and the work practice standards, reduction measures and management practices of Table 2d to this subpart that applies to the permittee.

Comment No. 4

The facility asked for the removed of Table 3.5 of PC 3.23 from the permit to eliminate confusion. (RED)

DEQ Response

The table was removed from the permit to help eliminate any confusion about which requirements are applicable to the facility. However the table was put in the SOB so the facility would have a quick reference to the requirements that are applicable to the facility. The SOB is a support document for the Permit Conditions stated within the permit.

Comments No. 5

The facility asked for the removal of PC 4.8. (RED)

DEQ Response

Permit Condition 4.8 was removed because the same federal requirement is stated in PC 4.9. So the duplication of a permit condition was removed.

Comment No. 6

The facility asked for a discussion of the date March 21, 2014 in PC 4.9. (BLUE)

DEQ Response

The date March 21, 2014 was the date established by EPA in the federal requirement and the citation is stated at the bottom right of this regulation. If the facility has a problem meeting this performance date by a qualified energy assessor, the facility should contact DEQ.

Comment No. 7

The facility has asked to remove the phrase "no later than 120 calendar days after May 20, 2011or" from PC 4.17(a)(2).

DEQ Response

The phrase appears to be obsolete since the present year is 2014, thus that section of PC 4.17(a)(2) was eliminated.

Comment No. 8

The facility asked that PC 4.17(a)(3) be eliminated for the permit.

DEQ Response

The performance stack test requirements have been established under other permitting actions and are restated in of the permit conditions of this permit. DEQ has removed PC 4.17(a)(3) from the permit.

Comment No. 9

The facility asked that a part of PC 4.17(a)(4) be eliminated for the permit. That part being "If the permittee must conduct a performance stack test, the permittee must submit the Notification of Compliance Status within 60 days of completing the performance stack test."

DEQ Response

The performance stack test requirements have been established under other permitting actions and are restated in of the permit conditions of this permit. DEQ has removed the portion of PC 4.17(a)(4) address in the facility's comment.

Comment No. 10

The facility asked to remove PC 4.17 (a)(4)(iii) from the permit.

DEQ Response

The facility does not use and baghouse for pollution control, thus this permit condition is not valid for the facility and was removed.

Comment No. 12

The facility asked that PC 4.17(4)(iv) be discussed and determined applicability. (GREEN)

DEQ Response

The permit condition PC 4.17(4)(iv) will be eliminated cause the facility is restricted to combust only woodwaste.

Comment No. 12

The facility asked to remove PC 4.17(a)(5) from the permit. (RED)

DEQ Response

The facility performs stack test as established through prior permitting actions. Thus the initial performance test requirement does not apply.

Comment No. 13

The facility asked the phrase "starting in 2015" be discussed. (BLUE)

DEQ Response

This the date stated within the statute. However the requirement of dated regarding semi and annual compliance is covered in the General Provisions of the permit. Thus the facility is showing compliance through the requirements of the General Provisions.

Comment No. 14

The facility asked that the statement in PC 4.18 be removed. The statement is "For boilers that are subject only to a requirement to conduct a biennial tune-up according to §63.11223(a) and not subject to emission limits or operating limits, the permittee may prepare only a biennial compliance report as specified in paragraphs (b)(1) through (4) of this section, instead of a semi-annual compliance report." (RED)

DEQ Response

The requirement regarding semi and annual compliance is covered in the General Provisions of the permit. Thus the facility is showing compliance through the requirements of the General Provisions.

Comment No. 15

The facility asked the red portion to be eliminate from the permit a portion of PC 4.19 (c)(2)(ii).
If you combust non-hazardous secondary materials that have been deterpc 4.19(c)(3)mined not to be solid waste pursuant to §241.3(b)(1), you must keep a record which documents how the secondary material meets each of the legitimacy criteria. If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4), you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c), you must keep a record that documents how the fuel satisfies the

requirements of the petition process.

DEQ Response

The facility is permitted to only combust woodwaste, thus permit conditions regarding other fuels are eliminated for the permit.

Comment No. 16

The facility asked to have remove from the permit the following: For sources that demonstrate compliance through fuel analysis, a copy of all calculations and supporting documentation that were done to demonstrate compliance with the mercury emission limits. Supporting documentation should include results of any fuel analyses. You can use the results from one fuel analysis for multiple boilers provided they are all burning the same fuel type.

DEQ Response

The emission for the facility is determined through testing for the stack, thus fuel analysis is note required by this permitting action. The PC 4.19(c)(3) is removed from the permit.

Comment No. 17

The facility asked for discussion the date of June 20, 2018 in PC 4.21.

DEQ response

This date was determined by the PTC issued on December 13, 2013.

Comment No. 18

The facility asked for discussion of PC 4.24 the following: In accordance with 40 CFR 63.11225(a)(1-2), the permittee must submit an initial notification as specified in Section 63.9(b)(2) not later than 120 days after January 20, 2014.

DEQ Response

This is for the one time energy analysis by a qualified energy assessor, this process should be for this permitting action only and become obsolete in the permit renewal.

Comment No. 17

The facility asked to discuss the starting date of 2015 stated in PC 4.26.

DEQ Response

The compliance certification reporting stated within the General Provisions of this permit will address PC 4.26. The facility is already submitting Semi and Annual Compliance Certifications.

Comment No.18

Regarding PC 6.8(e)

The facility asked for the first line to be eliminated from the permit.

If the permittee owns or operates an existing emergency located at an area source of HAPs emissions, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission –related instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions

DEQ Response

The paragraph has been rewritten to be more direct.

The permittee owns or operates an existing emergency located at an area source of HAPs emissions, the permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission –related instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

Comment No. 19

Regarding PC 6.8(f)

The facility asked for the first line to be eliminated from the permit.

If the permittee owns or operates an existing emergency stationary RICE located at an area source of HAPs emissions you must install a non-resettable hour work meter if one is not already installed.

DEQ Response

The paragraph has been rewritten to be more direct.

The permittee owns or operates an existing emergency stationary RICE located at an area source of HAPs emissions, the permittee must install a non-resettable hour work meter if one is not already installed. The PC was rewritten to be more direct.

Comment No. 20

Regarding PC 6.8(h)

The facility asked for a portion of the first line to be eliminated from the permit.

If the permittee operates a new, reconstructed, or existing stationary engine, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

DEQ Response

The paragraph has been rewritten to be more direct.

The permittee operates an existing stationary engine, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to this subpart apply

Comment No. 21

Regarding PC 6.8(h)(i)

The facility asked for the entire PC to be eliminated from the permit.
(i) If the permittee owns or operates a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine

DEQ Response

This permit condition is designed to make available an alternative method to show compliance with the applicable requirements in Table 2d. Since the facility wants this PC removed and has chosen another method to demonstrate compliance, DEQ will remove the PC from the permit.

Comment No. 22

Regarding PC 6.9(f)
The facility the red section stated below to be removed from the permit.
If the permittee owns or operates an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that was installed on or after June 12, 2006, or an existing emergency stationary RICE located at an area source of HAP emissions,

DEQ Response

The highlighted area was rewritten to only state the type of engine at the facility.

The permittee owns or operates an existing emergency stationary RICE located at an area source of HAP emissions,

Comment No. 23
Regarding PC 6.10(f)
The facility the red section stated below to be removed from the permit.

If the permittee owns or operates any of the stationary RICE in paragraph (f)(2) of this section,

DEQ Response
The red section above was rewritten to state the following:

The permittee owns or operates a stationary Rice I paragraph (f)(2) of this section,

Additional Comments were made by DEQ regarding additional clarity, misspellings, and incorrect citations.

These were added to the permit and statement of basis, they did not change any permit conditions or emission limits.