



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR
TONI HARDESTY, DIRECTOR

March 13, 2007

Certified Mail No. 7005 1160 0000 1550 2027

Sandra Pommerening
Superintendent
Kellogg School District No. 391
810 Bunker Avenue
Kellogg, Idaho 83837

RE: Facility ID No. 079-00040, Kellogg School, Kellogg
Final Permit Letter

Dear Mrs. Pommerening:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-060131 to Kellogg School District, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on November 14, 2006, and is effective immediately. This permit does not release Kellogg School District from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Coeur d' Alene Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSDB\bf Project No. P-060131

Enclosures

c: Dan Redline, Regional Office
Bill Rogers, Permit Coordinator
Dan Pitman, Permit Writer
Marilyn Seymore/ Pat Rayne, Air Quality Division
Laurie Kral, US EPA Region 10
Permit Binder
Source File
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CAA	Clean Air Act
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
gr	grain (1 lb = 7,000 grains)
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
m	meter(s)
MMBtu	million British thermal units
PM	particulate matter
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060131

Permittee:	Kellogg School District No. 391	Facility ID No. 079-00040
Location:	Kellogg, Idaho	

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This permit to construct (PTC) allows for the construction of a wood-fired boiler. This PTC is the initial permit for the boiler.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	<p><u>Wood Fired Boiler</u> Manufacturer: Hurst Boiler/Messersmith Combustor Rated Heat Input Capacity (MMBtu/hr): 2.0 Stack Height (ft): 50 Stack Diameter (ft): 1.25 Exhaust gas volume (acfm): 975 Exhaust gas temperature (°F): 350</p>	None

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2. EMISSIONS UNIT NAME

2.1 Process Description

The wood-fired boiler consists of a Hurst Boiler and a Messersmith Combustor, a gasifying, multi-chamber wood waste combustion system. The Messersmith Combustor is a sloped grate assembly fed by a stoker auger.

2.2 Emissions Control Description

Emissions from the wood-fired boiler are uncontrolled.

Table 2.1 WOOD FIRED HOT WATER BOILER

Emissions Unit	Emissions Control Device	Emissions Point
Wood-fired boiler	None	Boiler stack

Emissions Limits

2.3 Formaldehyde Limit

Formaldehyde emissions from the wood-fired boiler stack shall not exceed 67.9 pounds per year.

2.4 Opacity Limit

Emissions from the wood-fired boiler stack, or any other stack, vent, or functionally equivalent opening associated with the wood-fired boiler, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.5 Fuel-Burning Equipment – Particulate Matter Standards

The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.200 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products in accordance with IDAPA 58.01.01.677.

Operating Requirements

2.6 Boiler Operations

The permittee shall operate the boiler in accordance with manufacturer’s recommendations and specifications.

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2.7 Annual Fuel Usage Limit

The maximum annual fuel usage shall not exceed 600 tons of wood per any consecutive 12-month period. The wood shall not be treated with any chemicals.

2.8 Reasonable Control of Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions may include, but are not limited to, the following:

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

Monitoring and Recordkeeping Requirements

2.9 Annual Fuel Usage Monitoring and Recordkeeping

The permittee shall monitor and record daily and monthly, the number of hours the boiler operates. The permittee shall then calculate the monthly fuel usage using Eq.1 below, or a DEQ-approved alternative. Annual fuel usage shall be determined by summing each monthly fuel usage, determined using Eq.1, over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 2.7.

Eq.1 Monthly fuel usage (tons/month) = monthly hours of operation x 0.185

Where: $0.185 = [(2.0 \times 10^6 \text{ Btu/hr}) / (5,400 \text{ Btu/lb wet wood})] (1\text{ton}/2000\text{lb})$

The most recent two years' compilation of records shall be kept onsite and shall be made available to DEQ representatives upon request.

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2.10 Manufacturer’s Recommendations and Specifications for the Operation of the Wood-Fired Boiler

The permittee shall maintain the manufacturer’s recommendations and specifications for the operation of the wood-fired boiler on site at all times and shall make them available to DEQ representatives upon request. A copy of the document shall be submitted to DEQ’s Coeur d’ Alene Regional Office at the following address:

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

Reporting Requirements

2.11 Reporting

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for any exceedance of any emissions limits contained in Permit Conditions 2.3, 2.4, and 2.5 during startup, shutdown, scheduled maintenance, safety measures, upset and breakdown.

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

[Idaho Code §39-101, et seq.]
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions 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]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

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

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

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

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this 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 and 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 58.01.01.211, 5/1/94]

Excess Emissions

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8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

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

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.