



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

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

July 25, 2013

Brent Higginson  
Facility Manager  
Blackfoot Facility of Basic American Foods, a Division of Basic American, Inc.  
415 West Collins Road  
Blackfoot, ID 83221

RE: Facility ID No. 011-00012, Blackfoot Facility of Basic American Foods, a Division of Basic American, Inc., Blackfoot  
Final Tier I Operating Permit Letter

Dear Mr. Higginson:

The Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. TI-2012.0030 to Blackfoot Facility of Basic American Foods, a Division of Basic American, Inc. at Blackfoot in accordance with IDAPA 58.01.01.300 through 386, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units. This permit replaces Tier I Operating Permit No. TI-060315, issued November 20, 2007. The enclosed operating permit is based on the information contained in your permit application received on May 19, 2012. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the Rules.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Rick Elkins, Air Quality Analyst, at 208-236-6160 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

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

Sincerely,

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

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS/CZ Permit No. T1-2012.0030 PROJ 61058

Enclosure

## Air Quality

### TIER I OPERATING PERMIT

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**Permittee** Blackfoot Facility of Basic American Foods, a  
Division of Basic American, Inc.

**Permit Number** T1-2012.0030

**Project ID** 61058

**Facility ID** 011-00012

**Facility Location** 415 West Collins Road  
Blackfoot, ID 83221

**Permit Authority**

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

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

**Date Issued** July 25, 2013

**Date Expires** July 25, 2018



Carole Zundel, Permit Writer



Mike Simon, Stationary Source Manager

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

ASTM	American Society for Testing and Materials
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	continuous emission monitoring systems
CFR	Code of Federal Regulations
CMS	continuous monitoring systems
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	CO <sub>2</sub> equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gr/dscf	grains (1 lb = 7,000 grains) per dry standard cubic foot
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMscf	million standard cubic feet
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O <sub>2</sub>	oxygen
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
PW	process weight rate
RICE	reciprocating internal combustion engine
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12-calendar month period
T1	Tier I operating permit
U.S.C.	United States Code
VOC	volatile organic compound

# 1. PERMIT SCOPE

## Purpose

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

1.1 This Tier I operating permit incorporates the following permit(s):

- Permit to Construct Letter, issued December 24, 1975
- Permit to Construct Letter, issued November 12, 1982
- Permit to Construct No. P-050301, issued September 16, 2005
- Permit to Construct No. P-2009.0043, FEC permit, issued January 20, 2011

1.2 This Tier I operating permit supersedes the following permit:

- Tier I Operating Permit No. T1-060315, issued November 20, 2007

## Regulated Sources

1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 REGULATED SOURCES

Permit Section	Source	Control Equipment
5	Boiler 1	Wet scrubber when burning fuel oil
	Boiler 2	
	Boiler 3	None
6	<u>Process A</u>	None
	Cooler None	
	Dryer - 7 MMBtu/hr, natural gas-fired	
	Dryer - 6 MMBtu/hr, steam heated and natural gas-fired	
7	<u>Process B</u>	None
	Dryer - 7 MMBtu/hr, natural gas-fired	
	Dryer - 7 MMBtu/hr, natural gas-fired	
	Dryers - Two, each rated at 6 MMBtu/hr, steam heated and natural gas-fired	
8	<u>Process C</u>	None (except source CTZ (5.75 MMBtu/hr dryer) has low-NOx burners)
	Dryer - Steam heated	
	Dryer - 6.05 MMBtu/hr pre-heater, 4.4 MMBtu/hr front dryer, 6.6 MMBtu/hr rear dryer, all natural gas-fired	
	Dryer - 10.3 MMBtu/hr, steam heated and natural gas-fired, with a 2.9 MMBtu/hr pre-heater, natural gas-fired	
	Dryer - 6 MMBtu/hr, natural gas-fired	
	Dryer - 1.5 MMBtu/hr, natural gas-fired	
	Dryer - 12 MMBtu/hr, natural gas-fired	
	Dryer - 12 MMBtu/hr, natural gas-fired	
Dryer - Steam heated		
Dryer - 5.75 MMBtu/hr, natural gas-fired		
9	Reyco Slice - space heater	None

## 2. FACILITY-WIDE CONDITIONS

Table 2.1 contains a summary of requirements that apply generally to emissions units at the facility.

**Table 2.1 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
2.2-2.4	Fugitive Dust	Reasonable control	IDAPA 58.01.01.650-651	2.3-2.4, 2.24, 2.30
2.5-2.6	Odors	Reasonable control	IDAPA 58.01.01.775-776	2.7, 2.24
2.7-2.9	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	2.9-2.10, 2.24, 2.30
2.10-2.14	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.10-2.14, 2.24, 2.30
2.15-2.16	PM	<u>Natural gas only</u> 0.015 gr/dscf at 3% O <sub>2</sub> <u>Fuel oil only</u> 0.05 gr/dscf at 3% O <sub>2</sub>	IDAPA 58.01.01.676-677	(see Emissions Unit/Source Name Section)
2.17-2.18	Sulfur Content	ASTM grade No. 1 fuel oil ≤ 0.3% by weight ASTM grade No. 2 fuel oil ≤ 0.5% by weight	IDAPA 58.01.01.725	2.18, 2.19, 2.24, 2.30
2.20	Open Burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600-623	2.20, 2.24, 2.30
2.21	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.21, 2.24, 2.30
2.22	Accidental Release Prevention	Compliance with 40 CFR 68	40 CFR 68	2.22, 2.24, 2.30
2.23	Recycling and Emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	2.23, 2.24, 2.30
2.24-2.25	Monitoring and Recordkeeping	Maintenance of required records	IDAPA 58.01.01.322.06	2.24, 2.25, 2.30
2.26-2.30	Testing	Compliance testing	IDAPA 58.01.01.157	2.24, 2.26-2.30, 2.30
2.30	Reports and Certifications	Submittal of required reports, notifications, and certifications	IDAPA 58.01.01.322.08	2.30
2.31	Incorporation of Federal Requirements by Reference	Compliance with applicable federal requirements referenced	IDAPA 58.01.01.107	2.31

### **Fugitive Dust**

- 2.1** All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.  
[IDAPA 58.01.01.650-651, 3/30/07]
- 2.2** The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.  
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 2.3** The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.  
[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (If observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

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

### **Odors**

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

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

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

### **Visible Emissions**

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:
- a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

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

[IDAPA 58.01.01.322.06, 5/1/94]

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

[IDAPA 58.01.01.322.07, 5/1/94]

## **Excess Emissions**

### *Excess Emissions - General*

- 2.10** The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the excess emissions facility wide conditions (Permit Conditions 3.11 through 3.15) and the regulations of IDAPA 58.01.01.130-136.

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

[IDAPA 58.01.01.132, 4/5/00]

### *Excess Emissions - Startup, Shutdown, Scheduled Maintenance*

- 2.11** In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:
- Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.
  - Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the permittee demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
  - Reporting and recording the information required pursuant to the excess emissions reporting and recordkeeping requirements (Permit Conditions 3.14 and 3.15) and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133, 4/11/06]

### *Excess Emissions - Upset, Breakdown, or Safety Measures*

- 2.12** In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:
- Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
  - Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
  - Report and record the information required pursuant to the excess emissions reporting and recordkeeping facility wide conditions (Permit Conditions 3.14 and 3.15) and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
  - During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

*Excess Emissions – Reporting and Recordkeeping*

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

[IDAPA 58.01.01.135, 4/11/06]

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

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

[IDAPA 58.01.01.136, 4/5/00]

**Fuel-burning Equipment**

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

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

**2.16** For fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of 10 MMBtu/hr or less, the permittee shall not discharge to the atmosphere PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas; and 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel.

[IDAPA 58.01.01.677, 5/1/94]

**Sulfur Content**

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

- Distillate fuel oil containing more than the following percentages of sulfur:
  - ASTM Grade 1 fuel oil, 0.3% by weight.
  - ASTM Grade 2 fuel oil, 0.5% by weight.

[IDAPA 58.01.01.725, 3/29/10]

**2.18** The permittee shall not sell, distribute, use, or make available for use any residual fuel oil containing more than one and three-fourths percentage (1.75%) sulfur by weight.

[IDAPA 58.01.01.727, 5/11/94]

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

[IDAPA 58.01.01.322.06, 5/1/94]

**Open Burning**

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

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

**Asbestos**

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

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

[40 CFR 61, Subpart M]

### **Accidental Release Prevention**

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

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

[40 CFR 68.10 (a)]

### **Recycling and Emissions Reductions**

#### **2.23 40 CFR Part 82 - Protection of Stratospheric Ozone**

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

[40 CFR 82, Subpart F]

### **Monitoring and Recordkeeping**

**2.24** 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]

**2.25** During periods when a process or activity is shut down or not operating, monitoring requirements for that process are suspended. In these circumstances, monitoring reports submitted shall note that the process was shut down or not operating, and shall provide, as applicable, the dates of shutdown and start-up.

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

### **Performance Testing**

**2.26** 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.

**2.28** 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]

**2.29** Unless a longer time is approved by DEQ, the permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

**2.30** The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the reports and certifications facility wide condition (Permit Condition 2.30).

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

### ***Reports and Certifications***

**2.30** 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  
Pocatello Regional Office  
444 Hospital Way, #300  
Pocatello, ID 83201  
Phone: (208) 236-6160  
Fax: (208) 236-6168

The periodic compliance certification required in the general provisions (General Provision 13.22) 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, 4/5/00]

### ***Incorporation of Federal Requirements by Reference***

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

- Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60
- National Emission Standards for Hazardous Air Pollutants, 40 CFR Part 61
- National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR Part 63

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

[IDAPA 58.01.01.107, 4/7/11]

### 3. REGULATED SOURCES

#### Summary Description

3.1 Table 3.1 lists all sources of regulated emissions in the FEC permit. The sources listed are those emissions units for which emissions of any criteria air pollutant exceeds 10 per cent (10%) of the levels contained in the definition of "significant" in IDAPA 58.01.01.006.

Table 3.1 REGULATED SOURCES

Permit Section	Source ID	Source Description	Emissions Control(s)
Boilers			
4	Boiler 1	Manufacturer: Murray Model: D-style S/N: 9925 Heat input rating: 57 MMBtu/hr Maximum steam production rate: 45,500 lb/hr Fuels: Natural gas, #2 fuel oil, and #6 fuel oil Date installed: 1982	Wet scrubber: Manufacturer: Carbo-Tech Environmental Group, Inc. Model: 48x48-96HE Type: Venturi Note: Venturi wet scrubber system is used whenever Boilers 1 and/or 2 are combusting fuel oil
	Boiler 2	Manufacturer: Johnston Model: 509 Series Heat input rating: 75.4 MMBtu/hr Maximum steam production rate: 62,100 lb/hr Fuels: Natural gas, #2 fuel oil, and #6 fuel oil Date installed: 1994	
	Boiler 3	Manufacturer: Springfield Model: 52 Heat input rating: 39 MMBtu/hr Maximum steam production rate: 30,000 lb/hr Date installed: 1975 Fuel: Natural gas and #2 fuel oil	None
Process A			
5	DHQ	Cooler	None
	DHT	Dryer - 7 MMBtu/hr, natural gas-fired	None
	DHU	Dryer - 7 MMBtu/hr, natural gas-fired	None
	DHZ	Dryer - 6 MMBtu/hr, steam heated and natural gas-fired	None
Process B			
6	DUQ	Dryer - 7 MMBtu/hr, natural gas-fired	None
	DUT	Dryer - 7 MMBtu/hr, natural gas-fired	None
	DUV	Dryers - Two, each rated at 6 MMBtu/hr, steam heated and natural gas-fired	None
	DQA	Dryer - 7 MMBtu/hr, natural gas-fired	None
	DQB	Dryer - 7 MMBtu/hr, natural gas-fired	None
Process C			
7	CIR	Dryer - Steam heated	None
	CXX/CYY	Dryer - 6.05 MMBtu/hr pre-heater, 4.4 MMBtu/hr front dryer, 6.6 MMBtu/hr rear dryer, all natural gas-fired	None
	CHX	Dryer - 10.3 MMBtu/hr, steam heated and natural gas-fired, with a 2.9 MMBtu/hr pre-heater, natural gas-fired	None
	HEB	Dryer - 6 MMBtu/hr, natural gas-fired	None
	CBB	Dryer - 1.5 MMBtu/hr, natural gas-fired	None
	CNV	Dryer - 12 MMBtu/hr, natural gas-fired	None
	CNW	Dryer - 12 MMBtu/hr, natural gas-fired	None
	CTU	Dryer - Steam heated	None
8	CTZ	Dryer - 5.75 MMBtu/hr, natural gas-fired	Low-NO <sub>x</sub> burner
		Space Heaters	None

[PTC No. 2009.0043, 1/20/2011]

## 4. FACILITY EMISSIONS CAP REQUIREMENTS

### Summary Description

#### 4.1 Process Description

This permit authorizes changes to the facility that increase emissions of criteria pollutants for those changes that comply with the terms and conditions of this permit and that meet the requirements of IDAPA 58.01.01.181. The exemption criteria in IDAPA 58.01.01.220-222 are not applicable to changes in design or equipment at the facility that result in any change in the nature or amount of emissions, provided that the permittee complies with the conditions of Sections 3 through 8 of this permit and meets the requirements of IDAPA 58.01.01.181.

[PTC No. 2009.0043, 1/20/2011]

4.2 Table 4.1 describes the devices used to control emissions from the facility.

**Table 4.1 FACILITY EMISSIONS DESCRIPTION**

Emissions Units / Processes	Control Devices	Emissions Point
Boiler 1	Scrubber <sup>2</sup>	Boiler Stacks
Boiler 2	Scrubber <sup>2</sup>	
Boiler 3	None	
Process A	None	Multiple Stacks from Process A
Process B	None	Multiple Stacks from Process B
Process C	None (except source CTZ has low-NOx burners)	Multiple Stacks from Process C
Reyco Slice – space heater	None	Fugitive emissions

<sup>1</sup> For a detailed list of equipment see Table 4.1.

<sup>2</sup> Either boiler must use the scrubber whenever it combusts fuel oil

[PTC No. 2009.0043, 1/20/2011]

4.3 Table 4.2 contains only a summary of the requirements that apply to the facility. Specific permit requirements are listed below Table 4.2.

**Table 4.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
4.4	Criteria pollutants	Various	PTC No. 2009.0043, 1/20/2011	4.5 and 4.8
4.6	Toxic air pollutants	Maintain documentation	PTC No. 2009.0043, 1/20/2011	4.8

## Emission Limits

### 4.4 Criteria Pollutant Facility Emissions Cap

The PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emissions from this facility shall not exceed any corresponding facility emissions cap (FEC) limits listed in Table 4.3.

Table 4.3 FEC EMISSIONS LIMITS

Source Description	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
	T/yr <sup>1</sup>				
Total Facility Emissions Cap	128	161	235	235	5.1

<sup>1</sup> Tons per rolling 12-month period.

[PTC No. 2009.0043, 1/20/2011]

## Monitoring and Recordkeeping Requirements

### 4.5 Criteria Pollutant Facility Emissions Cap Compliance

4.5.1 The permittee shall calculate and record estimated total PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, and Pb emissions for all combustion sources each calendar month, based on fuel consumption, steam production, or heat input rating for natural gas, #2 fuel oil, and #6 fuel oil combustion sources, using the emission factors provided in Appendices A-F of this permit, or other DEQ approved method. Emission factors included in Appendices A-F of this Permit may be updated, with concurrence of DEQ. To update an emission factor, the permittee shall submit to DEQ the proposed revised emission factor and the basis for the revisions. Upon approval by DEQ, the updated emission factor shall replace the corresponding emissions factor in Appendices A-F. Records shall be maintained on site for a period of at least five years and shall be made available to DEQ representatives upon request.

[PTC No. 2009.0043, 1/20/2011]

4.5.2 The permittee shall calculate and record estimated total PM<sub>10</sub> and SO<sub>2</sub> emissions for all production-related sources each calendar month, based on pounds of unit process throughput for production processes and using the emission factors provided in Appendices A-F of this permit, or other DEQ approved method. Emission factors included in Appendices A-F of this Permit may be updated, with concurrence of DEQ. To update an emission factor, the permittee shall submit to DEQ the proposed revised emission factor and the basis for the revisions. Upon approval by DEQ, the updated emission factor shall replace the corresponding emissions factor in Appendices A-F. Records shall be maintained on site for a period of at least five years and shall be made available to DEQ representatives upon request.

[PTC No. 2009.0043, 1/20/2011]

4.5.3 The permittee shall calculate rolling 12-month total estimated emissions of PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, and Pb for each calendar month. Emissions totals shall be available within 30 days of the end of a month. The permittee shall total PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, and Pb emissions as calculated for the combustion sources and the production sources to determine compliance with the criteria pollutant FEC. Records shall be maintained on site for a period of at least five years and shall be made available to DEQ representatives upon request.

[PTC No. 2009.0043, 1/20/2011]

### 4.6 Demonstration of Preconstruction Compliance with Toxic Standards

4.6.1 The permittee shall maintain documentation of compliance with the requirements of IDAPA 58.01.01.210 for any modifications made to the facility after the issuance date of this permit that may increase toxic air pollutants.

[PTC No. 2009.0043, 1/20/2011]

## **Reporting Requirements**

### **4.7 Reporting Requirement**

- 4.7.1 Once per year, the permittee shall report to DEQ the 12-month total facility-wide criteria pollutant emissions recorded under the Criteria Pollutant Emissions Calculation (Permit Condition 4.5.3) used to determine compliance with the Criteria Pollutant FEC (Permit Condition 4.4). The report shall include, but is not limited to, all methods, equations, emissions factors, and sources for emissions factors not previously identified used to determine the 12-month total facility-wide criteria pollutant emissions. Records of the quantity of fuel consumption, steam production, and process throughput used for determining the 12-month total facility-wide criteria pollutant emissions shall be submitted with the annual report. In addition, the permittee shall provide DEQ with the 12-month rolling emissions totals generated under the Criteria Pollutant Emissions Calculation (Permit Condition 4.5.3) for the reporting period.

Any changes in the List of Emissions Units (Permit Condition 4.2) not identified in the previous annual report shall be identified and explained. The report shall be for the period January 1<sup>st</sup> through December 31<sup>st</sup> and shall be due on or before January 30<sup>th</sup> of each calendar year. All reports must be certified in accordance with IDAPA 58.01.01.123. The report shall be sent to DEQ at the following address:

Air Quality Stationary Source Division  
Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
Telephone: (208) 373-0502  
Fax: (208) 373-0340

[PTC No. 2009.0043, 1/20/2011]

## **General FEC Conditions**

### **4.8 Notice and Recordkeeping of Ambient Concentration Estimates**

- 4.8.1 For facility changes that comply with the terms and conditions establishing the FEC but are not included in the estimate of ambient concentration analysis approved for the permit establishing the FEC, the permittee shall review the estimate of ambient concentration analysis. In the event the facility change would result in a significant contribution (as defined in IDAPA 58.01.01.006) above the design concentration determined by the estimate of ambient concentration analysis approved for the permit establishing the FEC, but does not cause or significantly contribute to a violation of any ambient air quality standard, the permittee shall provide notice to DEQ in accordance with IDAPA 58.01.01.181.01.b. This notice shall also identify new or modified emission factors used to estimate emissions for purposes of this review of the estimate of ambient concentration analysis and for determining compliance with the Criteria Pollutant Facility Emissions Cap Compliance (Permit Condition 4.5).

The permittee shall record and maintain documentation of the review of the ambient concentration analysis on site.

[PTC No. 2009.0043, 1/20/2011]

- 4.8.2 In accordance with IDAPA 58.01.01.181.03, the permittee shall use the most current EPA-approved regulatory guideline model to estimate ambient concentrations where required by the Demonstration of Preconstruction Compliance with Toxic Standards (Permit Condition 4.6.1), except where DEQ approves the permittee's use of an alternative model. The permittee is strongly encouraged to submit a modeling protocol to DEQ for review and approval prior to conducting a modeling analysis using a model that differs from that used in the permit application.

[PTC No. 2009.0043, 1/20/2011]

#### **4.9 Renewal**

- 4.9.1 In accordance with IDAPA 58.01.01.179.02, the permittee shall submit a complete application for a renewal of the terms and conditions establishing the FEC at least six months before, but no earlier than 18 months before, the expiration date of the FEC permit.
- 4.9.2 In accordance with IDAPA 58.01.01.177, the permittee's renewal application for the FEC portions of Permit to Construct No. 2009.043 must include the information required under Sections 176 through 181 and Subsections 177.01 through 177.03.
- 4.9.3 In accordance with IDAPA 58.01.01.177.02.d, regarding Estimates of Ambient Concentrations, for a renewal of terms and conditions establishing a FEC, it is presumed that the previous permitting analysis is satisfactory, unless the Department determines otherwise.

[PTC No. 2009.0043, 1/20/2011]

#### **4.10 Non-Renewal**

- 4.10.1 If the permittee elects to not renew the terms and conditions establishing the FEC, the permittee shall notify the Department of this decision at least six months before, but not earlier than 18 months before, the expiration date of the FEC provisions of this permit.
- 4.10.2 If the permittee has made any changes or modifications in accordance with the FEC terms and conditions for which a PTC would have been needed absent the FEC, the permittee's notice shall identify the changes or modifications and request issuance of one or more PTCs to cover them.
- 4.10.3 Upon expiration of the FEC terms and conditions, all other provisions of Permit to Construct No. P-2009.0043 shall remain in effect as a Permit to Construct.

[PTC No. 2009.0043, 1/20/2011]

#### **4.11 List of Emissions Units**

- 4.11.1 A list of boilers, dryers, coolers, and space heaters (except for space heaters with emissions which are "Below Regulatory Concern") installed at the facility, which are subject to permitting requirements, shall be maintained by the permittee and provided to DEQ personnel upon request. The list shall include:
- Identification if equipment was included in the permit application;
  - Identification if in service at time of permit issuance;
  - Equipment location;
  - Installation date, if installed after permit issuance;
  - De-installation date if removed after permit issuance; and
  - Identification if equipment is subject to NSPS requirements (40 CFR 60).

[PTC No. 2009.0043, 1/20/2011]

## 5. BOILER 1, BOILER 2, and BOILER 3

### Summary Description

5.1 Table 5.1 describes the devices used to control emissions from Boilers 1, 2, and 3.

**Table 5.1 BOILERS 1, 2, AND 3 DESCRIPTION**

Emissions Units / Processes	Control Devices
Boiler 1	<u>Wet Scrubber</u> Manufacturer: Carbo-Tech Environmental Group, Inc. Model: 48x48-96HE Venturi type wet scrubber system used whenever Boilers 1 or 2 are combusting fuel oil Monitoring: SO <sub>2</sub> emissions continuously monitored SO <sub>2</sub> Monitor: Sick Maihak in-situ SO <sub>2</sub> gas analyzer and FLOWSIC volume flow measuring unit
Boiler 2	
Boiler 3	None

5.2 Table 5.2 contains only a summary of the requirements that apply to boilers. Specific permit requirements are listed below Table 5.2.

**Table 5.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
5.3	PM <sub>10</sub> , SO <sub>2</sub> , NO <sub>x</sub> , and CO	Various	PTC No. P-050301, 9/16/05	5.26-5.29, 5.31-33, 5.35, 5.38
5.4	Boilers Nos. 1 & 2 NO <sub>x</sub>	96.64 lbs/1,000 gal No. 6	PTC No. P-050301, 9/16/05	5.29, 5.31, 5.32, 5.38
5.5	Boiler No. 2 PM	0.03 lb/MMBtu	40 CFR 60.43c(e)(1)	5.21, 5.23, 5.30, 5.34, 5.35
5.6	Boiler No. 2 SO <sub>2</sub>	0.5 lb/MMBtu or oil ≤ 0.5wt%	40 CFR 60.42c	5.22, 5.23, 5.30, 5.31, 5.36
5.7	Boiler No. 2 Visible Emissions	20% opacity	40 CFR 60.43c; PTC No. P-050301, 9/16/05	5.23, 5.25, 5.26
5.8	Boilers 1 and 2 SO <sub>2</sub> and Visible Emissions	Same as Permit Conditions 5.6 and 5.7	PTC No. P-050301, 9/16/05	5.22, 5.23, 5.30, 5.31, 5.36
5.9	Boilers 1 and 2 Nickel	240 lb/yr	IDAPA 58.01.01.210.08, 6/30/95; PTC No. P-050301, 9/16/05	5.30, 5.32
5.10	Boilers 1, 2, and 3 NO <sub>x</sub>	198 T/yr	PTC No. P-050301, 9/16/05	5.29
5.11	Boilers 1, 2, and 3 Fuel Restrictions	Various	IDAPA 58.01.01.727-728, 5/1/94; PTC No. P-050301, 9/16/05	5.30, 5.33
5.12	Boiler 3 Operating Schedule	NG 3.28 MMscf per year Oil 393,120 gallons per year	PTC No. P-050301, 9/16/05	5.32.1
5.13	Boiler 1 and 2 Fuel Use	15,384 gallons per day and 4,097,682 gallons per year	PTC No. P-050301, 9/16/05	5.32
5.14	Boiler 1, 2, and 3 steam limit when using oil	80,000 pounds per hour	PTC No. P-050301, 9/16/05	5.32.5
5.15	Boiler 1 and 2 scrubber	Various	PTC No. P-050301, 9/16/05	5.35

## Emission Limits

### 5.3 PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, and CO Emissions - Boilers 1, 2, and 3

Emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), oxides of nitrogen (NO<sub>x</sub>), and carbon monoxide (CO) from the exhaust stacks of Boilers 1, 2, and 3 shall not exceed the values listed in Table 5.3.

**Table 5.3 BOILER CRITERIA EMISSION LIMITS<sup>A</sup> - HOURLY (LB/HR) AND ANNUAL<sup>B, C</sup> (T/YR)**

Source Description	PM <sub>10</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler 1	---	---	---	---	---	---	4.6	---
Boiler 2	---	---	---	---	---	---	6.1	---
Boiler 3	0.30	---	1.9	---	5.4	---	1.8	---
Combined emissions from Boilers 1 and 2	5.7	---	45.3	---	61.9	---	---	---
Combined emissions from Boilers 1, 2, and 3	---	18.3	---	145	---	198	---	46

<sup>A</sup> As determined by a pollutant specific U.S. EPA reference method, or DEQ approved alternative, or as determined by DEQ's emission estimation methods used in this permit analysis.

<sup>B</sup> As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

<sup>C</sup> T/yr is tons of emissions per any consecutive 12-month period

[PTC No. P-050301, 9/16/05]

### 5.4 NO<sub>x</sub> Emissions - Boilers 1 and 2

Emissions of NO<sub>x</sub> from the exhaust stacks of Boilers 1 and 2 shall each not exceed 96.64 pounds per 1000 gallons when No. 6 oil is combusted.

[PTC No. P-050301, 9/16/05]

### 5.5 PM Emissions - Boiler 2

No owner or operator of an affected facility that commences construction, reconstruction, or modification after February 28, 2005, and that combusts coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of 0.030 lb/MMBtu heat input.

[40 CFR 60.43c(e)(1)]

### 5.6 Sulfur Dioxide Emissions - Boiler 2 - NSPS

In accordance with 40 CFR 60.42c(d), on and after the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, whichever date comes first, when oil is combusted in Boiler 2 the permittee shall not cause to be discharged into the atmosphere from Boiler 2 any gases that contains SO<sub>2</sub> in excess of 215 ng/J (0.50 lb/million Btu) heat input; or, as an alternative, when oil is combusted in Boiler 2 the permittee shall not combust oil in Boiler 2 that contains greater than 0.5 weight percent sulfur.

5.6.1 In accordance with 40 CFR 60.42c(g), compliance with the fuel oil sulfur limits and emission limits of this section shall be determined on a 30-day rolling average basis.

5.6.2 In accordance with 40 CFR 60.42c(i), the SO<sub>2</sub> emission limits and fuel oil sulfur limits under this section apply at all times, including periods of startup, shutdown, and malfunction.

5.6.3 In accordance with 40 CFR 60.42c(j), only the heat input supplied to Boiler 2 from the combustion of oil is counted under this section. No credit is provided for the heat input to Boiler 2 from other fuels or for heat derived from exhaust gases from other sources, such as internal combustion engines and kilns.

[40 CFR 60.42c; PTC No. P-050301, 9/16/05]

**5.7 Visible Emissions - Boiler 2 - NSPS**

On and after the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, whichever date comes first, the permittee shall not cause to be discharged into the atmosphere from Boiler 2 any gases that exhibit greater than 20% opacity (six-minute average), except for one six-minute period (average) per hour of not more than 27% opacity in accordance with 40 CFR 60.43c(c).

- 5.7.1 The opacity standard under 40 CFR 60.43c(c) applies at all times, except during periods of startup, shutdown, or malfunction in accordance with 40 CFR 60.43c(d).

[40 CFR 60.43c; PTC No. P-050301, 9/16/05]

**5.8 SO<sub>2</sub> and Visible Emissions with Merged Exhaust - Boiler 1**

When the exhausts from Boiler 1 and 2 are merged ahead of a single scrubber to comply with Permit Condition 5.17, the exhaust from Boiler 1 shall be subject to the same emissions limits set forth for Boiler 2 in Permit Conditions 5.6 and 5.7, and the permittee may install applicable continuous monitoring systems on each effluent or the combined effluent from Boilers 1 and 2 in accordance with 40 CFR 60.13(g).

[40 CFR 60.13(g); PTC No. P-050301, 9/16/05]

**5.9 Nickel Emissions - Boilers 1 and 2**

Combined emissions of nickel from the exhaust stacks of Boilers 1 and 2 shall not exceed 240 pounds per any consecutive 12-month period.

[IDAPA 58.01.01.210.08,6/30/95; PTC No. P-050301, 9/16/05]

**5.10 NO<sub>x</sub> Emissions - Boilers 1, 2, and 3**

The combined emissions of NO<sub>x</sub> from Boiler 1, Boiler 2, and Boiler 3 shall not exceed 198 tons per any consecutive 12-month period.

[PTC No. P-050301, 9/16/05]

***Operating Requirements***

**5.11 Fuel Specifications - Boilers 1, 2, and 3**

- 5.11.1 Boilers 1 and 2 may burn natural gas, distillate oil, or residual oil. Boiler 3 may burn natural gas fuel as primary fuel and low sulfur distillate oil as secondary fuel.

- 5.11.2 The sulfur content of distillate oil burned in the Boiler 3 shall not exceed 0.05% sulfur by weight.

[IDAPA 58.01.01.727-728, 5/1/94; PTC No. P-050301, 9/16/05]

**5.12 Annual Operating Schedule - Boiler 3**

- The quantity of natural gas combusted in Boiler 3 shall not exceed 328 million standard cubic feet (MMscf) per year, based on any consecutive 12-month period.
- The quantity of distillate oil combusted in Boiler 3 shall not exceed 393,120 gallons per year, based on any consecutive 12-month period.

[PTC No. P-050301, 9/16/05]

**5.13 Residual Oil Throughput - Boilers 1 and 2**

The combined quantity of residual oil combusted in Boiler 1 and Boiler 2 shall not exceed 15,384 gallons per day and 4,097,682 gallons per year, based on any consecutive 12-month period.

[PTC No. P-050301, 9/16/05]

**5.14 Simultaneous Boiler Operation - Boilers 1, 2, and 3**

Whenever residual oil is combusted in Boiler 1 or Boiler 2, the combined quantity of steam produced by all three boilers shall not exceed 80,000 pounds per hour, based on a daily average.

[PTC No. P-050301, 9/16/05]

### **5.15 Wet Scrubbing System - Boilers 1 and 2**

The permittee shall install, maintain and operate a wet scrubbing system to control emissions of SO<sub>2</sub> and PM<sub>10</sub> from Boiler 1 and Boiler 2 as follows:

- 5.15.1 Emissions of SO<sub>2</sub> and PM<sub>10</sub> from Boiler 1 shall be controlled using a wet scrubber when fuel oil is combusted. When Boiler 1 combusts natural gas, wet scrubbing of the Boiler 1 exhaust is not required.
- 5.15.2 Emissions of SO<sub>2</sub> and PM<sub>10</sub> from Boiler 2 shall be controlled using a wet scrubber when fuel oil is combusted. When Boiler 2 combusts natural gas, wet scrubbing of the Boiler 2 exhaust is not required.
- 5.15.3 When Boiler 1 combusts distillate or residual oil, Boiler 1 shall exhaust through the stack that serves the scrubber. When Boiler 1 combusts natural gas, Boiler 1 may exhaust through its own stack.
- 5.15.4 When Boiler 2 combusts distillate or residual oil, Boiler 2 shall exhaust through the stack that serves the scrubber. When Boiler 2 combusts natural gas, Boiler 2 may exhaust through its own stack.

[PTC No. P-050301, 9/16/05]

### **5.16 Wet Scrubber Operating Parameters - Boilers 1 and 2**

The permittee shall install, calibrate, operate and maintain equipment to measure each of the following operating parameters for the wet scrubbing system. When the wet scrubbing system is required to be operated, each operating parameter shall be maintained within the specifications established in the O&M manual:

- Pressure drop across the scrubber, or DEQ-approved alternative monitoring, for ensuring dispersion and mixing of scrubbing solution with air;
- Scrubbing solution pH; and
- Scrubbing solution flow rate.

[PTC No. P-050301, 9/16/05]

### **5.17 O & M Manual- Wet Scrubbers**

Within 60 days after startup of the wet scrubbing systems, the permittee shall have developed an O&M manual for the wet scrubbing system, which describes the procedures that will be followed to comply with the PTC General Provisions and the manufacturer specifications for the air pollution control device. At a minimum the following items shall be addressed in the manual:

- The manufacturer's recommended minimum and maximum values, or DEQ-approved alternatives, for each of the following operating parameters: pressure drop, for ensuring dispersion and mixing of the scrubbing solution with the air stream; the scrubbing solution pH; and the scrubbing solution flow rate.
- Inspection checklists for items that will be periodically inspected while the treatment system is operating, including frequency of inspection.
- Inspection checklist for items that will be inspected when the device is taken out of operation and physically opened for inspection (e.g., internal components), including frequency of these internal inspections.
- Periodic planned maintenance for the control devices.

The contents of the O&M manual shall be based on manufacturer's information to the extent practical. When the manufacturer's information is not used (e.g., a DEQ-approved alternative or performance test information is used in lieu of manufacturer information), this shall be explained in the manual. The O&M manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-050301, 9/16/05]

### **5.18 Annual Boiler Tune-up - Boilers 1, 2, and 3**

The burners in each boiler shall be tuned annually to maintain efficient fuel combustion.

**5.19 Maintenance of Facilities and Air Pollution Control Equipment - Boiler 2 (NSPS)**

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate Boiler 2 including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions in accordance with 40 CFR 60.11(d).

[40 CFR 60.11(d); PTC No. P-050301, 9/16/05]

**5.20 40 CFR 63 Subpart JJJJJJ Requirement**

If the facility uses fuel oil in any of the boilers, compliance with the provisions of 40 CFR 63 Subpart JJJJJJ is required. In addition, an off-permit change of the facility's Tier I operating permit may be required.

[IDAPA 58.01.01.322]

***Monitoring and Recordkeeping Requirements***

**5.21 General Performance Testing - Boiler 2 - NSPS**

Performance testing conducted for Boiler 2 under 40 CFR Part 60 Subpart Dc shall be performed in accordance with 40 CFR 60 Subpart A, including but not limited to the following requirements under 40 CFR 60.8 and 60.11.

- 5.21.1 Within 60 days after achieving the maximum production rate at which Boiler 2 facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the EPA Administrator under section 114 of the Act, the owner or operator of such facility shall conduct performance test(s) and furnish the EPA Administrator a written report of the results of such performance test(s) in accordance with 40 CFR 60.8(a).
- 5.21.2 For the purpose of demonstrating initial compliance, opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 except as otherwise provided in 40 CFR 60.11(e)(l).
- 5.21.3 Performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in 40 CFR 60 Subpart Dc unless the EPA Administrator provides otherwise in accordance with 40 CFR 60.8(b).
- 5.21.4 Performance tests shall be conducted under such conditions as the EPA Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the EPA Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard in accordance with 40 CFR 60.8(c).

[40 CFR 60.8, 60.11; PTC No. P-050301, 9/16/05]

**5.22 Compliance and Performance Test Methods and Procedures for SO<sub>2</sub> - Boiler 2 - NSPS**

- 5.22.1 Except as provided in paragraphs 40 CFR 60.44c(g) and (h) and in 60.8(b), performance tests required under 40 CFR 60.8 shall be conducted following the procedures specified in 40 CFR 60.44c(b), (c), (d), and (e), as applicable. Section 60.8(t) does not apply to this section. The 30-day notice required in 40 CFR 60.8(d) applies only to the initial performance test unless otherwise specified by the EPA Administrator in accordance with 40 CFR 60.44c(a).
- 5.22.2 The initial performance test required under 40 CFR 60.8 shall be conducted over 30 consecutive operating days of the steam generating unit. Compliance with the SO<sub>2</sub> emission limits under 40 CFR 60.42c shall be determined using a 30-day average. The first operating day included in the initial performance test shall be scheduled within 30 days after achieving the maximum production rate at which Boiler 2 will be

operated, but not later than 180 days after the initial startup of the Boiler 2. The steam generating unit load during the 30-day period does not have to be the maximum design heat input capacity, but must be representative of future operating conditions in accordance with 40 CFR 60.44c(b).

- 5.22.3 After the initial performance test required under paragraph 40 CFR 60.44c(b) and 60.8, compliance with the SO<sub>2</sub> emission limits under 40 CFR 60.42c is based on the average SO<sub>2</sub> emission rates for 30 consecutive steam generating unit operating days. A separate performance test is completed at the end of each steam generating unit operating day, and a new 30-day average SO<sub>2</sub> emission rate is calculated to show compliance with the standard in accordance with 40 CFR 60.44c(c).
- 5.22.4 If only oil is combusted in Boiler 2, the procedures in Method 19 are used to determine the hourly SO<sub>2</sub> emission rate ( $E_{ho}$ ) and the 30-day average SO<sub>2</sub> emission rate ( $E_{ao}$ ). The hourly averages used to compute the 30-day averages are obtained from the continuous emission monitoring system (CEMS). Method 19 shall be used to calculate  $E_{ao}$  when using daily fuel sampling or Method 6B in accordance with 40 CFR 60.44c(d).
- 5.22.5 In accordance with 40 CFR 60.44c(g), for oil-fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under 40 CFR 60.42c based on shipment fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less. Thereafter, the owner or operator of the affected facility shall sample the oil in the fuel tank after each new shipment of oil is received, as described under 40 CFR 60.46c(d)(2).
- 5.22.6 In accordance with 40 CFR 60.44c(j), the owner or operator of an affected facility shall use all valid SO<sub>2</sub> emissions data in calculating  $E_{ho}$  under 40 CFR 60.44c(d) or (e), as applicable, whether or not the minimum emissions data requirements under 40 CFR 60.46c(f) are achieved. All valid emissions data, including valid data collected during periods of startup, shutdown, and malfunction, shall be used in calculating  $E_{ho}$  pursuant to 40 CFR 60.44c(d) or (e), as applicable.

[40 CFR 60.44c; PTC No. P-050301, 9/16/05]

**5.23 Monitoring Compliance and Performance Test Methods and Procedures for PM- Boiler 2 - NSPS**

- 5.23.1 In accordance with 40 CFR 60.45c(a), the owner or operator of an affected facility subject to the opacity standards under 40 CFR 60.43c shall conduct an initial performance test as required under 40 CFR 60.8, and shall conduct subsequent performance tests as requested by the EPA Administrator, to determine compliance with the standards using the following procedures and reference methods:

Particulate matter emissions shall be determined using the methods and procedures in 40 CFR 60.45c(a)(1)-(7).

Method 9 (six-minute average of 24 observations) shall be used for determining the opacity of stack emissions in accordance with 40 CFR 60.45c(a)(8).

- 5.23.2 In accordance with 40 CFR 60.47c(a), the owner or operator of an affected facility combusting residual oil that is subject to the opacity standards under 40 CFR 60.43c shall install, calibrate, maintain, and operate a COMS for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system.
- 5.23.3 In accordance with 40 CFR 60.47c(b), all COMS for measuring opacity shall be operated in accordance with the applicable procedures under Performance Specification 1 (40 CFR Part 60 Appendix B). The span value of the opacity COMS shall be between 60 and 80%.

[40 CFR 60.45c, 60.47c; PTC No. P-050301, 9/16/05]

## **5.24 Emission Monitoring for SO<sub>2</sub> Emissions - Boiler 2 - NSPS**

- 5.24.1 In accordance with 40 CFR 60.46c(a), except as provided in 40 CFR 60.46c(d) and (e), the owner or operator of an affected facility subject to the SO<sub>2</sub> emission limits under 40 CFR 60.42c shall install, calibrate, maintain, and operate a CEMS for measuring SO<sub>2</sub> concentrations and either oxygen or carbon dioxide concentrations at the outlet of the SO<sub>2</sub> control device (or the outlet of the steam generating unit if no SO<sub>2</sub> control device is used), and shall record the output of the system. The percent reduction requirements under 40 CFR 60.42c do not apply and the permittee is not required to measure SO<sub>2</sub> concentrations and either oxygen or carbon dioxide concentrations at both the inlet and outlet of the SO<sub>2</sub> control device.
- 5.24.2 In accordance with 40 CFR 60.46c(b), the one-hour average SO<sub>2</sub> emission rates measured by a CEMS shall be expressed in ng/J or lb/million Btu heat input and shall be used to calculate the average emission rates under 40 CFR 60.42c. Each one-hour average SO<sub>2</sub> emission rate must be based on at least 30 minutes of operation and include at least two data points representing two 15-minute periods. Hourly SO<sub>2</sub> emission rates are not calculated if the affected facility is operated less than 30 minutes in a 1-hour period and are not counted toward determination of a steam generating unit operating day.
- 5.24.3 In accordance with 40 CFR 60.46c(c), the procedures under 40 CFR 60.13 shall be followed for installation, evaluation, and operation of the CEMS.
- (1) All CEMS shall be operated in accordance with the applicable procedures under Performance Specifications 1, 2, and 3 (40 CFR Part 60 Appendix B).
  - (2) Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with Procedure 1 (40 CFR Part 60 Appendix F).
  - (3) 40 CFR 60.46c(c)(3) does not apply
  - (4) The span value of the SO<sub>2</sub> CEMS at the outlet from the SO<sub>2</sub> control device (or outlet of the steam generating unit if no SO<sub>2</sub> control device is used) shall be 125% of the maximum estimated hourly potential SO<sub>2</sub> emission rate of the fuel combusted.
- 5.24.4 As an alternative to operating an SO<sub>2</sub> CEMS, fuel sampling may be conducted in accordance with 40 CFR 60.46c(d).
- 5.24.5 In accordance with 40 CFR 60.46c(f), the owner or operator of an affected facility operating a CEMS pursuant to 40 CFR 60.46c(a), or conducting as-fired fuel sampling pursuant to 40 CFR 60.46c(d)(1), shall obtain emission data for at least 75% of the operating hours in at least 22 out of 30 successive steam generating unit operating days. If this minimum data requirement is not met with a single monitoring system, the owner or operator of the affected facility shall supplement the emission data with data collected with other monitoring systems as approved by the EPA Administrator.

[40 CFR 60.46c; PTC No. P-050301, 9/16/05]

## **5.25 Alternative Opacity and SO<sub>2</sub> Monitoring Procedures - Boiler 2 - NSPS**

After receipt and consideration of a written application, the EPA Administrator may approve alternatives to any monitoring procedures or requirements of 40 CFR Part 60 in accordance with 40 CFR 60.13(i). If approved, provisions of the alternate opacity monitoring plan will replace permit provisions requiring a COMS.

[40 CFR 60.13; PTC No. P-050301, 9/16/05]

## **5.26 Opacity and SO<sub>2</sub> Monitoring - Boilers 1 and 2**

- 5.26.1 Whenever oil is combusted in Boiler 1, opacity from the Boiler 1 stack shall be monitored by complying with the opacity requirements described in the 40 CFR Part 60 (NSPS) requirements for Boiler 2 as described in the operating requirements of this boiler section of this permit, or complying with the alternative opacity monitoring procedure identified in Permit Condition 5.24 and Appendix G.
- 5.26.2 Whenever oil is combusted in Boiler 1 or Boiler 2, SO<sub>2</sub> emissions from the Boiler(s) shall be monitored by complying with the SO<sub>2</sub> CEMS or fuel sampling requirements as described in the 40 CFR Part 60

(NSPS) requirements for Boiler 2, as described in Section 3 of this permit, for purposes of complying with the Compliance Assurance Monitoring (CAM) exemption requirements under 40 CFR 64.2(b)(1)(vi). Maintaining records of fuel receipts for fuel oil may not be used for this purpose.

[40 CFR 64.2; PTC No. P-050301, 9/16/05]

**5.27 PM Performance Test - Boiler 1 and Boiler 2**

At least once every five years a PM performance test shall be conducted on the stack of Boiler 1 and Boiler 2, when firing No.6 fuel oil, to demonstrate compliance with the PM emission limit in Permit Condition 2.15. Each boiler shall be tested while operating alone and each may be tested on a different date so long as each boiler is tested no less than once every 5 years. The test shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5, or a DEQ-approved alternative. The performance test shall be performed in accordance with IDAPA 58.01.01.157 and the following requirements:

- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report.
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.
- The quantity of fuel oil combusted by the boiler during the test shall be recorded in units of gallons per hour.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-050301, 9/16/05]

**5.28 Initial PM Performance Test - Boiler 2**

Within 60 days of achieving the maximum production rate of Boiler 2 when firing No. 6 fuel oil, but not later than 180 days after issuance of this permit, an initial performance test shall be conducted to measure PM emissions from the stack of Boiler 2, when firing No.6 fuel oil, to demonstrate compliance with the PM emission limit in Permit Condition 2.15. The test shall be conducted in accordance with the procedures specified in Permit Condition 2.28.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-050301, 9/16/05]

**5.29 NO<sub>x</sub> Performance Test - Boilers 1 and 2**

Within 60 days of achieving the maximum production rate of Boiler 1 and Boiler 2 when firing No.6 fuel oil, but not later than 180 days after issuance of this permit, and at least once every five years thereafter, performance tests shall be conducted to measure NO<sub>x</sub> emissions from the stacks of Boiler 1 and Boiler 2, when firing No.6 fuel oil, to demonstrate compliance with the pound per hour NO<sub>x</sub> emission limits in Permit Condition 5.4. Each boiler shall be tested while operating alone and each may be tested on a different date so long as each boiler is tested no less than once every five years. The tests shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 7E, or a DEQ approved alternative. Each performance test shall be performed in accordance with IDAPA 58.01.01.157 and the following requirements:

- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report.
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.
- The quantity of fuel oil combusted by the boiler during the test shall be recorded in units of gallons per hour.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-050301, 9/16/05]

**5.30 Record Keeping Requirements - Boiler 2 - NSPS**

5.30.1 The owner or operator shall record and maintain records of the amounts of each fuel combusted during each day in accordance with 40 CFR 60.48c(g).

5.30.2 All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record in accordance with 40 CFR 60.48c(i).  
[40 CFR 60.48c; PTC No. P-050301, 9/16/05]

**5.31 Records of Boiler Tuning - Boilers 1, 2, and 3**

Records shall be maintained of boiler tuning providing the date the tuning was conducted and a description of adjustments made to the burners to improve combustion efficiency.

[PTC No. P-050301, 9/16/05]

**5.32 Monitoring of Boiler Operating Parameters**

The following operating data shall be monitored and recorded for Boilers 1, 2, and 3:

5.32.1 On a monthly basis, record the quantity of natural gas combusted in Boiler 3 in units of MMscf per month and MMscf per consecutive 12-month period. The annual fuel consumption shall be determined by summing the most recent monthly quantity and the monthly quantities over the previous consecutive 11 month period.

5.32.2 On a monthly basis, record the quantity of distillate oil combusted in Boiler 3 in units of gallons per month and gallons per consecutive 12-month period.

5.32.3 On a monthly basis, record the combined quantity of residual oil combusted in Boiler 1 and Boiler 2 in units of gallons per month and gallons per consecutive 12-month period.

5.32.4 On a daily basis, record the date and the combined quantity of residual oil combusted that day in Boiler 1 and Boiler 2.

5.32.5 Each day that residual oil is combusted in Boiler 1 or Boiler 2, record the following: date; total combined pounds of steam produced that day by all three boilers; and the combined average quantity of steam produced by all three boilers in units of pounds per hour, based on a daily average.

[PTC No. P-050301, 9/16/05]

**5.33 Fuel Sulfur Content Receipts - Boilers 1, 2, and 3**

For each shipment of fuel oil received, the permittee shall obtain and maintain at the facility fuel receipts from the fuel supplier which demonstrate the oil received complies with the fuel sulfur content limits specified in Permit Condition 2.17 and IDAPA 58.01.01.725-728.

[IDAPA 58.01.01.727-728, 5/1/94; PTC No. P-050301, 9/16/05]

**5.34 40 CFR 60 Subpart A General Provisions - Boiler 2 - NSPS**

The permittee shall comply with the requirements of 40 CFR 60 Subpart A for Boiler 2 including, but not limited to, notification of commencement of construction within 30 days of commencement and notification of actual date of startup postmarked within 15 days of that date.

[40 CFR 60 Subpart A; PTC No. P-050301, 9/16/05]

**5.35 Wet Scrubber Operating Parameters - Boilers 1 and 2**

The pressure drop, scrubbing solution pH and scrubbing solution flow rate shall be monitored and recorded once each week when the wet scrubbing system is required to be operated. Monitoring records shall be maintained onsite for a period of five years and made available to DEQ representatives upon request.

[PTC No. P-050301, 9/16/05]

## **Reporting Requirements**

### **5.36 Notifications and Reporting Requirements - Boiler 2 - NSPS**

- 5.36.1 In accordance with 40 CFR 60.48c(a), the permittee shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include:
- (1) The design heat input capacity of Boiler 2 and identification of fuels to be combusted in Boiler 2.
  - (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c or 60.43c.
  - (3) The annual capacity factor at which the owner or operator anticipates operating Boiler 2 based on all fuels fired and based on each individual fuel fired.
  - (4) Notification if an emerging technology will be used for controlling SO<sub>2</sub> emissions as described in 40 CFR 60.48c(a)(4).
- 5.36.2 In accordance with 40 CFR 60.48c(b), the owner or operator of each affected facility subject to the SO<sub>2</sub> emission limits of 40 CFR 60.42c, or the opacity limits of 40 CFR 60.43c, shall submit to the EPA Administrator the performance test data from the initial and any subsequent performance tests and, if applicable, the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in 40 CFR 60 Appendix B.
- 5.36.3 In accordance with 40 CFR 60.48c(c), the owner or operator of each residual oil-fired affected facility subject to the opacity limits under 40 CFR 60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility which occur during the reporting period.
- 5.36.4 In accordance with 40 CFR 60.48c(d), the owner or operator of each affected facility subject to the SO<sub>2</sub> emission limits or fuel oil sulfur limits under 40 CFR 60.42c shall submit reports to the EPA Administrator.
- 5.36.5 In accordance with 40 CFR 60.48c(e), the owner or operator of each affected facility subject to the SO<sub>2</sub> emission limits or fuel oil sulfur limits under 40 CFR 60.42c shall keep records and submit reports as required under 40 CFR 60.48c(d), including the following information, as applicable:
- (1) Calendar dates covered in the reporting period.
  - (2) Each 30-day average SO<sub>2</sub> emission rate (ng/J or lb/million Btu), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken.
  - (3) 40 CFR 60.48c(e)(3) does not apply
  - (4) Identification of any steam generating unit operating days for which SO<sub>2</sub> or diluent (oxygen or carbon dioxide) data have not been obtained by an approved method for at least 75 percent of the operating hours; justification for not obtaining sufficient data; and a description of corrective actions taken.
  - (5) Identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a description of corrective actions taken if data have been excluded for periods other than those during which oil was not combusted in the steam generating unit.
  - (6) Identification of the F factor used in calculations, method of determination, and type of fuel combusted.
  - (7) Identification of whether averages have been obtained based on CEMS rather than manual sampling methods.

- (8) If a CEMS is used, identification of any times when the pollutant concentration exceeded the full span of the CEMS.
- (9) If a CEMS is used, description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specifications 2 or 3 (40 CFR 60 Appendix B).
- (10) If a CEMS is used, results of daily CEMS drift tests and quarterly accuracy assessments as required under 40 CFR 60 Appendix F, Procedure 1.

5.36.6 In accordance with 40 CFR 60.48c(j), the reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the EPA Administrator and shall be postmarked by the 30th day following the end of the reporting period.

**5.37 Notifications and Reporting to DEQ - Boilers 1 and 2**

A copy of all reports submitted to EPA for NSPS requirements shall also be submitted to DEQ.

[PTC No. P-050301, 9/16/05]

**5.38 Performance Test Reports DEQ - Boilers 1 and 2**

Each performance test report, including the required process data, shall be submitted to DEQ within 60 days of the date on which the performance test is conducted.

[PTC No. P-050301, 9/16/05]

***NSPS General Provisions***

**5.39 NSPS 40 CFR 60, Subpart A – General Provisions**

The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A – General Provisions in accordance with 40 CFR 60.1 whenever the facility burns fuel oil in Boilers 1 and/or 2. A summary of requirements for affected facilities is provided in Table 5.4.

**Table 5.4 NSPS 40 CFR 60, SUBPART A – SUMMARY OF GENERAL PROVISIONS**

Section	Subject	Summary of Section Requirements
60.4	Address(es)	All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart(s) shall be submitted to:  Pocatello Regional Office Department of Environmental Quality 444 Hospital Way #300 Pocatello, ID 83201
60.7(a),(b), and (f)	Notification and Recordkeeping	<ul style="list-style-type: none"> <li>• Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date.</li> <li>• Notification shall be furnished of initial startup postmarked within 15 days of such date.</li> <li>• Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made.</li> <li>• Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment during periods when its use is required; or any periods during which a CMS or monitoring device is required to be used, but is inoperative.</li> <li>• Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.</li> </ul>
60.7(a),(c), (d), (e), and (f)	Notification and Recordkeeping (CMS)	<ul style="list-style-type: none"> <li>• Notification shall be furnished of the date upon which demonstration of the CMS performance commences.</li> <li>• Excess emissions and monitoring systems performance report shall be submitted semiannually, postmarked by January 30th and July 30th. Reports shall contain the information and be in the</li> </ul>

		<p>format specified in 40 CFR 60.7(c) and (d).</p> <ul style="list-style-type: none"> <li>Records of CEMS subhourly measurements shall be maintained in accordance with the requirements of 40 CFR 60.7(f).</li> </ul>
60.8	Performance Tests	<ul style="list-style-type: none"> <li>At least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present.</li> <li>Within 60 days of achieving the maximum production rate, but not later 180 days after initial startup, performance test(s) shall be conducted and a written report of the results of such test(s) furnished.</li> <li>Performance testing facilities shall be provided as follows: <ul style="list-style-type: none"> <li>Sampling ports adequate for test methods applicable to such facility.</li> <li>Safe sampling platform(s).</li> <li>Safe access to sampling platform(s).</li> </ul> </li> <li>Utilities for sampling and testing equipment.</li> <li>Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f).</li> </ul>
60.11(a), (d), (f), and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> <li>When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8.</li> <li>At all times, including periods of startup, shutdown, and malfunction, the owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.</li> <li>For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.</li> </ul>
60.11(b), (c), and (e)	Compliance with Standards and Maintenance Requirements (Opacity)	<ul style="list-style-type: none"> <li>Compliance with opacity standards shall be determined by Method 9 in Appendix A of 40 CFR 60. The permittee may elect to use COM measurements in lieu of Method 9, provided notification is made at least 30 days before the performance test.</li> <li>The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided.</li> <li>Opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 in accordance with the requirements and exceptions in 40 CFR 60.11(e).</li> </ul>
60.12	Circumvention	<ul style="list-style-type: none"> <li>No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.</li> </ul>
60.13	Monitoring Requirements (CMS)	<ul style="list-style-type: none"> <li>All CMS and monitoring devices shall be installed and operational prior to conducting performance tests required by 40 CFR 60.8.</li> <li>A performance evaluation of the COMS or CEMS shall be conducted before or during any performance test and a written report of the results of the performance evaluation furnished. Reporting requirements include submitting performance evaluations reports within 60 days of the evaluations required by this section, and submitting results of the performance evaluations for the COM within 10 days before a performance test, if using a COM to determine compliance with opacity during a performance test instead of Method 9.</li> <li>The zero and span calibration drifts must be checked at least once daily and adjusted in accordance with the requirements in 40 CFR 60.13(d).</li> <li>The zero and upscale (span) calibration drifts of a COMS must be automatically, intrinsic to the opacity monitor, checked at least once daily.</li> <li>Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CMS shall be in continuous operation and shall meet minimum frequency of operation requirements as specified in 40 CFR 60.13(e).</li> </ul>

		<ul style="list-style-type: none"> <li>• All CMS or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. CMS shall be located and installed in accordance with the requirements in 40 CFR 60.13(f) and (g).</li> <li>• Data shall be reduced and computed in accordance with the procedures in 40 CFR 60.13(h), (i), and (j).</li> </ul>
60.14	Modification	<ul style="list-style-type: none"> <li>• A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14.</li> <li>• Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.</li> </ul>
60.15	Reconstruction	<ul style="list-style-type: none"> <li>• An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.</li> </ul>

[40 CFR 60, Subpart A]

## 6. PROCESS A

### Summary Description

The following is a narrative description of Process A regulated in this Tier I operating permit. This description is for informational purposes only.

Process A produces dehydrated potato products. The raw materials put into the process are cooked potatoes and food additives, including sulfites. Process A can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process A include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. The drying unit processes can potentially emit SO<sub>2</sub> from the decomposition of sulfites. Drying heat is provided by both natural gas combustion and steam produced by the plant's boilers.

This process was constructed in the early 1960s.

Table 6.1 describes the devices used to control emissions from Process A.

**Table 6.1 PROCESS A DESCRIPTION**

Emissions Units / Processes	Control Devices
Process A: DHQ-cooler DHT -dryer (7 MMBtu/hr natural gas-fired) DHU -dryer (7 MMBtu/hr natural gas-fired) DHZ -dryer (6 MMBtu/hr steam and natural gas-fired)	None

Table 6.2 contains only a summary of the requirements that apply to Process A. Specific permit requirements are listed below Table 6.2.

**Table 6.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
6.1	PM	Process Weight	IDAPA 58.01.01.702	6.2
2.7	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	6.2

## **Emission Limits**

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

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

$$E = 0.045(PW)^{0.6}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

**6.1.1** The process weight PM limitation applies to the collection of emissions units/processes identified in Table 6.1. Demonstrating compliance with the visible emissions requirement contained in Permit Condition 6.2 inherently demonstrates compliance with the process weight PM emissions limitations.

[IDAPA 58.01.01.322.01, 3/19/99]

## **Monitoring and Recordkeeping Requirements**

**6.2** To demonstrate compliance with Permit Condition 2.7, the permittee shall conduct a monthly one minute observation of each affected emissions point or source, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point or source, a six-minute observation, using EPA Method 9, shall be conducted. The visible emissions evaluations shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and shall be maintained in accordance with Permit Condition 2.24.

[IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 5/1/94]

## 7. PROCESS B

### Summary Description

The following is a narrative description of Process B regulated in this Tier I operating permit. This description is for informational purposes only.

Process B produces dehydrated potato products. The raw materials put into the process are cooked potatoes and food additives, including sulfites. Process B can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process B include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. The drying unit processes can potentially emit SO<sub>2</sub> from the decomposition of sulfites. Drying heat is provided by both natural gas combustion and steam produced by the plant's boilers.

This process was constructed in the early 1960s.

Table 7.1 describes the devices used to control emissions from Process B. DUQ, DUT, DUV, DQA, and DQB are vents from Process B.

**Table 7.1 PROCESS B DESCRIPTION**

Emissions Units / Processes	Control Devices
DUQ - dryer (7 MMBtu/hr natural gas-fired) DUT - dryer (7 MMBtu/hr natural gas-fired) , DUV - 2 dryers (6 MMBtu/hr each, steam and natural gas-fired) DQA - dryer (7 MMBtu/hr natural gas-fired) DQB - dryer (7 MMBtu/hr natural gas-fired)	None

Table 7.2 contains only a summary of the requirements that apply to Process B. DDQ, DDT, DUV, DQA, and DQB are vents from Process B. Specific permit requirements are listed below Table 7.2.

**Table 7.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
7.1	PM	Process Weight	IDAPA 58.01.01.702	7.2
2.7	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	7.2

## **Emission Limits**

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

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

$$E = 0.045(PW)^{0.6}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

7.1.1 The process weight PM limitation applies to the collection of emissions units/processes identified in Table 7.1. Demonstrating compliance with the visible emissions requirement contained in Permit Condition 7.2 inherently demonstrates compliance with the process weight PM emissions limitations.

[IDAPA 58.01.01.322.01, 3/19/99]

## **Monitoring and Recordkeeping Requirements**

7.2 To demonstrate compliance with Permit Condition 2.7, the permittee shall conduct a monthly one minute observation of each affected emissions point or source, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point or source, a six-minute observation, using EPA Method 9, shall be conducted. The visible emissions evaluations shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and shall be maintained in accordance with Permit Condition 2.24.

[IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 5/1/94]

## 8. PROCESS C

### Summary Description

#### 8.1 Process Description

The following is a narrative description of Process C regulated in this Tier I operating permit. This description is for informational purposes only.

Process C produces dehydrated food products. The raw materials put into the process include raw and cooked foods, previously dehydrated foods, and food additives, including sulfites. Process C can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process C include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. The process equipment can potentially emit SO<sub>2</sub> from the decomposition of sulfites. Drying heat is provided by steam produced by the plant's boilers and natural gas-fired heaters.

[PTC No. 2009.0043, 1/20/2011]

#### 8.2 Emission Control Description

The following table includes emissions units that are not regulated sources as identified and enumerated in Table 8.1. The additional units are included here because their emissions are included in the determinations of process weight limitations.

**Table 8.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emissions Unit(s)/Processes	Emission Control Device
<b>Process C:</b> ALT/ALQ/ALB: Dryer – steam heated ALX/ALW/ALV/ALY: Dryer – steam heated AGQ/AEV/AEW: Dryer – steam heated CHV/CIR: Dryer- steam heated CXX/CYY: Dryer - 6.05 MMBtu/hr pre-heater, 4.4 MMBtu/hr front dryer, 6.6 MMBtu/hr rear dryer, and a 1.2 MMBtu/hr final heater, natural gas-fired CHX: Pre-dryer – 12.2 MMBtu/hr, natural gas-fired CHY/CHZ: Dryer – 2.5 MMBtu/hr, natural gas-fired CIS: Dryer – steam heated CIT: Dryer – steam heated HEB/HNL: Dryer – steam heated with optional 14 MMBtu/hr pre-heater, natural gas-fired CNV: Dryer - 12 MMBtu/hr, natural gas-fired CNW: Dryer - 12 MMBtu/hr, natural gas-fired CTU: Dryer - steam heated CTZ: Finish dryer - 5.75 MMBtu/hr, natural gas-fired CBB: Dryer – 1.5 MMBtu/hr, natural gas-fired CTQ/CTR/CTS/CTT: Dryer – 10.8 MMBtu/hr, natural gas-fired and steam heated TCD/TCO: Dryer – 2 MMBtu/hr, natural gas-fired and steam heated TAC/TAH: Pre-dryer – 2.5 MMBtu/hr, natural gas-fired EGS/EGT/CHI/CHK/ENV/DSX/ENR/EDO: Materials transport systems IBE/EUW/FIF: Animal feed materials recovery units	None  Except the burners associated with source CTZ (low-NO <sub>x</sub> burners)

The Permit to Construct issued on January 20, 2011 authorizes the above-listed modifications and changes as being covered by PTCs.

[PTC No. P-2009.0043, 1/20/2011]

Table 8.2 contains only a summary of the requirements that apply to Process C. Specific permit requirements are listed below Table 8.2.

**Table 8.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
8.3	PM	Process Weight	IDAPA 58.01.01.701, 4/5/00; PTC No. P-2009.0043, 1/20/2011	8.8
8.4	Emission Limits	Various	PTC No. P-2009.0042, 8/26/09; PTC No. 2009.0043, 1/20/2011	8.5, 8.6, 8.7
8.5	Fuel Restriction for CTZ Dryer	Natural gas only	PTC No. P-2009.0042, 8/26/09; PTC No. 2009.0043, 1/20/2011	2.24
8.6	Hourly Production Limit for CTZ Dryer	2,800 lb/hr	PTC No. P-2009.0042, 8/26/09; PTC No. 2009.0043, 1/20/2011	8.9
8.7	Annual Production Limit for CTZ Dryer	15,698,000 lb/yr	PTC No. P-2009.0042, 8/26/09; PTC No. 2009.0043, 1/20/2011	8.10

### ***Emission Limits***

#### **8.3 Particulate Matter – New Equipment Process Weight Limitations**

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

- If PW is less than 9,250 lb/hr,  
 $E = 0.045 (PW)^{0.60}$
- If PW is equal to or greater than 9,250 lb/hr,  
 $E = 1.10 (PW)^{0.25}$

[IDAPA 58.01.01.701, 4/5/00; PTC No. P-2009.0043, 1/20/2011]

8.3.1 The process weight PM limitation applies to the collection of emissions units/processes identified in Table 8.1. Demonstrating compliance with the visible emissions requirement contained in the Visible Emissions Monitoring requirement (Permit Condition 8.8) inherently demonstrates compliance with the process weight PM emissions limitations.

[IDAPA 58.01.01.322.01, 3/19/99; PTC No. P-2009.0043, 1/20/2011]

#### 8.4 Emissions Limits

The PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emissions from the stack of finish dryer CTZ shall not exceed any corresponding emissions rate limits listed in the following table.

Table 8.3 NATURAL GAS-FIRED FINISH DRYER CTZ EMISSIONS LIMITS<sup>1</sup>

Source Description	PM <sub>10</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr	T/yr <sup>2</sup>	lb/hr	T/yr <sup>2</sup>	lb/hr	T/yr <sup>2</sup>	lb/hr	T/yr <sup>2</sup>	lb/hr	T/yr <sup>2</sup>
Finish Dryer CTZ	0.58	1.63	0.12	0.36	0.20	0.88	1.43	6.24	0.06	0.26

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

[PTC No. P-2009.0042, 8/26/09; PTC No. 2009.0043, 1/20/2011]

#### **Operating Requirements**

##### 8.5 Allowable Fuel Types

The CTZ finish dryer shall combust only natural gas as fuel.

[PTC No. P-2009.0042, 8/26/09; PTC No. 2009.0043, 1/20/2011]

##### 8.6 Dehydrated Food Products Hourly Production Weight Rate Limit

The dehydrated food products production rate for the CTZ finish dryer shall not exceed 2,800 lb/hr.

[PTC No. P-2009.0042, 8/26/09; PTC No. 2009.0043, 1/20/2011]

##### 8.7 Dehydrated Food Products Annual Production Weight Rate Limit

The dehydrated food products production rate for the CTZ finish dryer shall not exceed 15,698,000 lb/yr in any consecutive 12-calendar months.

[PTC No. P-2009.0042, 8/26/09; PTC No. 2009.0043, 1/20/2011]

#### **Monitoring and Recordkeeping Requirements**

##### 8.8 Visible Emissions Monitoring

To demonstrate compliance with the Particulate Matter – New Equipment Process Weight Limitations (Permit Condition 8.3), the permittee shall conduct a monthly one-minute observation of each affected emissions point, or source, using EPA Method 22 (in 40 CFR 60, Appendix A). If visible emissions in excess of 10% opacity are observed from any emissions point, or source, a six-minute observation, using EPA Method 9, shall be conducted. The visible emissions evaluations shall be performed during daylight hours under normal operating conditions. The results of each evaluation shall be recorded and shall be maintained in accordance with the Recordkeeping General Requirements permit condition.

[IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 5/1/94; PTC No. 2009.0043, 1/20/2011]

##### 8.9 Dehydrated Food Products Hourly Production Weight Monitoring

To demonstrate compliance with the dehydrated food products hourly production limit the permittee shall monitor and record dehydrated food products production for the CTZ finish dryer daily. Hourly production shall be determined by dividing total daily dehydrated food products production by the actual hours of operation for the day.

[PTC No. P-2009.0042, 8/26/09; PTC No. 2009.0043, 1/20/2011]

**8.10 Dehydrated Food Products Annual Production Weight Monitoring**

To demonstrate compliance with the dehydrated food products annual production limit the permittee shall monitor and record dehydrated food products production for the CTZ finish dryer monthly and annually. Annual throughput shall be determined by summing total monthly dehydrated food products production over each previous consecutive 12-month period.

[PTC No. P-2009.0042, 8/26/09; PTC No. 2009.0043, 1/20/2011]

***Recordkeeping***

**8.11** The permittee shall comply with the recordkeeping requirements of Facility-Wide Permit Condition 2.24.

[PTC No. P-2009.0042, 8/26/09; PTC No. 2009.0043, 1/20/2011]

## 9. PLANT SPACE HEATERS

### 9.1 Process Description

The BAF Blackfoot Facility has natural gas-fired space heaters ranging in size from less than 200,000 Btu/hr to 7.5 MMBtu/hr. At the time of permit issuance, total space heater combustion capacity is 59.5 MMBtu/hr. Most of the units provide direct heating; i.e., the combustion air from the unit is discharged directly into the room to provide heating. The only space heater installed at the facility that required a PTC, but for which a PTC has not previously been issued, is the Reyco Slice space heater. PTC No. 2009.0043, issued 1/20/2011, authorizes the Reyco space heater as being covered by a PTC. The aggregate of all other space heaters at the facility qualifies for a single Category I exemption from PTC permitting under IDAPA 58.01.01.223.05.

[PTC No. 2009.0043, 1/20/2011]

### 9.2 Emission Control Description

Table 9.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit(s)/Processes	Emission Control Device
Reyco Slice: Space heater - 13.0 MMBtu/hr, natural gas-fired	None

[PTC No. 2009.0043, 1/20/2011]

### ***Emissions Limits***

#### 9.3 Emissions Limits

There are no emission limits specifically applicable to the plant space heaters. Emissions from plant space heaters are regulated as part of the facility emissions cap in Permit Section 4.

[PTC No. 2009.0043, 1/20/2011]

### ***Monitoring and Recordkeeping Requirements***

#### 9.4 Process Description

The permittee shall determine the total natural gas usage of plant space heaters on a monthly basis. Natural gas combusted in the plant space heaters will be calculated as the difference between total facility natural gas usage less natural gas combusted in the boilers and process dryers. Emissions shall be calculated using the emission factors in the appendices of the permit.

[PTC No. 2009.0043, 1/20/2011]

## 10. RICE

### Summary Description

#### 10.1 Process Description

The facility operates an emergency propane-fired reciprocating internal combustion engine (RICE).

#### 10.2 Emission Control Description

**Table 10.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emissions Unit(s)/Processes	Emission Control Device
Manufacturer: International Harvester Model: UV-549 Serial Number: 10225 Construction Date: 1962 Fuel: Propane Cylinders: 8 Horsepower: 201 net HP at 2800 rpm full load Displacement: 49 cubic inches	None

Table 10.2 contains only a summary of the requirements that apply to the RICE. Specific permit requirements are listed below Table 10.2.

**Table 10.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
None	Comply with 40 CFR 63 Subpart ZZZZ	None	40 CFR 63 Subpart ZZZZ	10.3-10.13

### Operating Requirements

#### 10.3 40 CFR 63 Subpart ZZZZ Maintenance Requirements

In accordance with 40 CFR 63 Subpart ZZZZ Table 2d, no later than October 19, 2013, except during periods of start-up, the permittee shall:

- 10.3.1 Change oil and filter every 500 hours of operation or annually, whichever comes first;
- 10.3.2 Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first;
- 10.3.3 Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

In accordance with 6625(j), an oil analysis program is available in order to extend the specified oil change requirement.

[40 CFR 63 Subpart ZZZZ Table 2d]

**10.4 40 CFR 63 Subpart ZZZZ General Operation and Maintenance Requirements**

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

[40 CFR 63.6605(b)]

**10.5 40 CFR 63 Subpart ZZZZ Additional Operation and Maintenance Requirements**

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 facility-developed maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions

[40 CFR 63.6625(e)]

**10.6 40 CFR 63 Subpart ZZZZ Idle at Startup**

In accordance with 40 CFR 63.6625(h), 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 40 CFR 63 Subpart ZZZZ Tables 1a, 2a, 2c, and 2d apply.

[40 CFR 63.6625(h)]

**10.7 40 CFR 63 Subpart ZZZZ Emergency Operation Requirements**

To remain classified as an emergency stationary RICE, and in accordance with 40 CFR 63.6640(f):

10.7.1 There is no time limit on the use of emergency stationary RICE in emergency situations.

10.7.2 The permittee may operate the emergency stationary RICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed in this permit condition counts as part of the 100 hours per calendar year allowed by this permit condition.

- Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the EPA Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

10.7.3 Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in this Emergency Operation Requirements permit condition. Except as provided in paragraphs (f)(4)(i) and (ii) of 40 CFR 63.6640, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[40 CFR 63.6640]

## ***Monitoring and Recordkeeping Requirements***

### **10.8 40 CFR 63 Subpart ZZZZ Continuous Compliance Demonstration**

In accordance with 40 CFR 63.6640 and Table 6, the permittee shall demonstrate continuous compliance by:

- 10.8.1 Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
- 10.8.2 Developing and following a maintenance plan designed by the permittee which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63 Subpart ZZZZ Table 6]

### **10.9 40 CFR 63 Subpart ZZZZ Maintenance Records**

The facility must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the facility operated and maintained the stationary RICE and after-treatment control device (if any) according to the maintenance plan.

[40 CFR 63.6655(e)]

### **10.10 40 CFR 63 Subpart ZZZZ Non-Resettable Hour Meter**

In accordance with 40 CFR 63.6655(f), the permittee 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 engine is used for the purposes specified in 40 CFR 63.6640(f)(2)(ii) or (iii) or 40 CFR 63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

[40 CFR 63.6655(f)]

## ***Reporting Requirements***

### **10.11 40 CFR 63 Subpart ZZZZ Notification**

In accordance with 40 CFR 63.6595(a)(1), the permittee must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

[40 CFR 63.6595(a)]

#### **10.12 40 CFR 63 Subpart ZZZZ Annual Report**

In accordance with 40 CFR 63.6650(h), if the emergency stationary RICE operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii) or operates for the purpose specified in 40 CFR 63.6640(f)(4)(ii), the permittee must submit an annual report according to the requirements in paragraphs (1) through (3) of this section.

(1) The report must contain the following information:

(i) Company name and address where the engine is located.

(ii) Date of the report and beginning and ending dates of the reporting period.

(iii) Engine site rating and model year.

(iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.

(v) Hours operated for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii).

(vi) Number of hours the engine is contractually obligated to be available for the purposes specified in 40 CFR 63.6640(f)(2)(ii) and (iii).

(vii) Hours spent for operation for the purpose specified in 40 CFR 63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in 40 CFR 63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

(viii) If there were no deviations from the fuel requirements in 40 CFR 63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.

(ix) If there were deviations from the fuel requirements in 40 CFR 63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.

(2) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

(3) The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ( [www.epa.gov/cdx](http://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 report must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13.

[40 CFR 63.6650(f)]

#### **10.13 40 CFR 63 Subpart ZZZZ Deviation Reporting**

In accordance with 40 CFR 63.6650(f), the permittee must report all deviations as defined in 40 CFR 63 Subpart ZZZZ in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A).

[40 CFR 63.6650(f)]

**10.14 40 CFR 63 Subpart ZZZZ Table 8 General Provisions**

In accordance with 40 CFR 63 Subpart ZZZZ Table 8, the permittee shall comply with the applicable general provisions.

**Table 10.3 40 CFR 63 Subpart ZZZZ Table 8 General Provisions**

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	No.	
§ 63.8(c)(1)(ii)	SSM not in Startup Shutdown Malfunction Plan	Yes.	
§ 63.8(c)(1)(iii)	Compliance with operation and maintenance requirements	No.	
§ 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.	Except that the most recent 2 years of data do not have to be retained on site.
§ 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 Table 8]

## 11. COMPLIANCE SCHEDULE

### 11.1 PM<sub>10</sub> Compliance

To ensure compliance with applicable requirements in the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01, the permittee shall implement the compliance requirements presented in the Exhaust Stacks Proposed For Removal and the Exhaust Stacks Proposed For Increased Stack Heights permit conditions. The Exhaust Stacks Proposed For Removal and the Exhaust Stacks Proposed For Increased Stack Heights permit conditions are necessary to ensure that PM<sub>10</sub> emissions from the facility do not cause or significantly contribute to a violation of the NAAQS. Any changes in the methods proposed or timeframes specified in this compliance schedule must be approved by DEQ prior to implementation. Upon issuance of PTC No. 2009.0043, issued 1/20/2011, the Permittee has three years to comply with the following permit requirements.

[PTC No. 2009.0043, 1/20/2011]

### 11.2 Exhaust Stacks Proposed For Removal

Unless an alternative compliance method has been demonstrated by Permittee and approved by DEQ the Permittee shall remove and render inoperable the following exhaust stacks at this facility:

**Table 11.1 EXHAUST STACKS  
PROPOSED FOR REMOVAL**

<b>Exhaust Stack</b>
CHI
CHK
DKV
DRY
DSK
DSO
DUU

[PTC No. 2009.0043, 1/20/2011]

**11.3 Exhaust Stacks Proposed For Increased Height**

Unless an alternative compliance method has been demonstrated by Permittee and approved by DEQ the Permittee shall increase the following exhaust stacks height at this facility to 90 feet or remove the stack from operation:

**Table 11.2 EXHAUST STACKS  
PROPOSED FOR INCREASED HEIGHT**

Exhaust Stack
CHX
CXX
DHT
DHU
DHZ
DQA
DQB
DUQ
DUT
DUV

[PTC No. 2009.0043, 1/20/2011]

**11.4 Exhaust Stacks Identification**

The exhaust stacks presented in both the Exhaust Stacks Proposed For Removal and the Exhaust Stacks Proposed For Increased Stack Heights permit conditions shall be identified in a manner that will allow a DEQ representative to positively identify each individual stack.

[PTC No. 2009.0043, 1/20/2011]

***Reporting Requirements***

**11.5 Reporting**

After the exhaust stacks have been modified or removed and the PM<sub>10</sub> modeling analyses have been completed, the permittee shall submit a final report to DEQ detailing the modifications made or the removals of the exhaust stacks and the dates that these actions occurred. If the permittee has submitted an alternate compliance demonstration program that has been approved by DEQ, in accordance with the PM<sub>10</sub> Compliance requirement (Permit Condition 11.1), the permittee's final report shall detail compliance with the provisions of that alternate compliance plan.

The report shall be sent to DEQ at the following address:

Air Quality Stationary Source Division  
Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706  
Telephone: (208) 373-0502  
Fax: (208) 373-0340

[PTC No. 2009.0043, 1/20/2011]

## 12. INSIGNIFICANT ACTIVITIES

12.1 Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in Table 12.1 to qualify for a permit shield. There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the facility-wide permit conditions (Section 2).

Table 12.1 INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Operation, loading, and unloading of storage tanks and storage vessels, with lids or other appropriate closures and less than 260-gallon capacity, heated only to the minimum extent necessary to avoid solidification.	(1)
Operation, loading and unloading of storage tanks not greater than 1,100-gallon capacity with lids, not containing hazardous air pollutants and with maximum vapor pressure of 550 mmHg.	(2)
Operation, loading and unloading of volatile organic compound storage tanks, 10,000-gallon capacity or less, with lids or other appropriate closure and vapor pressure no greater than 80 mmHg at 21°C.	(3)
Operation, loading, unloading, and storage of butane, propane, or liquefied petroleum gas (LPG) in storage tanks or vessels less than 40,000-gallon capacity,	(4)
Combustion sources, less than five MMBtu/hr, use exclusively natural gas, butane, propane, and/or LPG.	(5)
Combustion source, not greater than 0.5 MMBtu/hr, if burning waste wood, wood waste, or waste paper.	(8)
Welding using not more than one /day of welding rod.	(9)
"Parylene" coaters using less than 500 gallons of coating per year.	(11)
Printing and silk-screening, using less than two gal/day of a combination of inks, coatings, adhesives, fountain solutions, thinners, retarders, or non-aqueous cleaning solutions.	(12)
Water cooling towers, not using chromium-based corrosion inhibitors, not using barometric jets or condensers, not greater than 10,000 gal/min, and not in direct contact with gaseous or liquid process streams containing regulated air pollutants.	(13)
Industrial water chlorination, less than 20 million gal/day capacity.	(16)
Surface coating, using less than two gal/day.	(17)
Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than five MMBtu/hr.	(5)
Tanks, vessels, and pumping equipment, with lids or other appropriate closure, for storage or dispensing of aqueous solutions of inorganic salts, bases and acids, excluding solutions with: 99% or greater sulfuric or phosphoric acid; 77% or greater nitric acid; 30% or greater hydrochloric acid; or more than one liquid phase where the top phase is more than 1% VOC.	(19)
Equipment, with lids or other appropriate closure, used exclusively to pump, load, unload, or store high-boiling-point organic material, with initial boiling point not less than 150°C or vapor pressure not more than five mmHg at 21°C.	(20)
Milling and grinding activities (paste forms, if used, are less than 1% volatile organic compounds).	(22)
Rolling, forging, drawing, stamping, shearing, and spinning metals.	(23)
Dip-coating operations using materials with less than 1% VOC.	(24)
Surface coating, aqueous solution or suspension containing less than 1% VOC.	(25)
Cleaning and stripping activities and equipment, using solutions having less than 1% volatile organic compounds by weight (no acid cleaning or stripping on metal substrates).	(26)
Storage and handling of water based lubricants for metal working with organic content less than 10%.	(27)
Natural gas-fired space heating units not listed in §9.2	(30)
Process A – DKW (vent from Process Equipment)	(30)
Process A – DKV (vent from Process Equipment)	(30)
Process B – DXS (vent from Process Equipment)	(30)
Process B – DUO (vent from Process Equipment)	(30)
Process B – DPY (vent from Process Equipment)	(30)
Process B – DPZ (vent from Process Equipment)	(30)
Process B – DUY (vent from Process Equipment)	(30)

Process B – DUZ (vent from Process Equipment)	(30)
Process B – DSO (vent from Process Equipment)	(30)
Process B – DSK (vent from Process Equipment)	(30)
Process B – DUU (vent from Process Equipment)	(30)
Process B – DRY (vent from Process Equipment)	(30)
Process C – ALB (vent from Process Equipment)	(30)
Process C – ALQ (vent from Process Equipment)	(30)
Process C – ALT (vent from Process Equipment)	(30)
Process C – ALY (vent from Process Equipment)	(30)
Process C – ALX (vent from Process Equipment)	(30)
Process C – ALV (vent from Process Equipment)	(30)
Process C – ALW (vent from Process Equipment)	(30)
Process C – AEV (vent from Process Equipment)	(30)
Process C – AEW (vent from Process Equipment)	(30)
Process C – AGQ (vent from Process Equipment)	(30)
Process C – CHV (vent from Process Equipment)	(30)
Process C – IBE (vent from Process Equipment)	(30)
Process C – CHY (vent from Process Equipment)	(30)
Process C – CHZ (vent from Process Equipment)	(30)
Process C – HNL (vent from Process Equipment)	(30)
Process C – CBB (vent from Process Equipment)	(30)
Process C – CTQ (vent from Process Equipment)	(30)
Process C – CTR (vent from Process Equipment)	(30)
Process C – CTS (vent from Process Equipment)	(30)
Process C – CTT (vent from Process Equipment)	(30)
Process C – TCD (vent from Process Equipment)	(30)
Process C – TCO (vent from Process Equipment)	(30)
Process C – TAC (vent from Process Equipment)	(30)
Process C – TAH (vent from Process Equipment)	(30)
Process C – TEM (vent from Process Equipment)	(30)
Process C – TEE (vent from Process Equipment)	(30)
Process C – ENV (vent from Process Equipment)	(30)
Process C – EUW (vent from Process Equipment)	(30)
Process C – ENR (vent from Process Equipment)	(30)
Process C – EDO (vent from Process Equipment)	(30)
Process C – ESX (vent from Process Equipment)	(30)
Process C – EGS (vent from Process Equipment)	(30)
Process C – EGT (vent from Process Equipment)	(30)
Process C – FIF (vent from Process Equipment)	(30)
Process C – CHK (vent from Process Equipment)	(30)
Process C – CHI (vent from Process Equipment)	(30)

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

### 13. NONAPPLICABLE REQUIREMENTS

State and federal air quality requirements (e.g., rules and regulations) currently determined not applicable to the permittee are listed below along with the reason for the non-applicability: [IDAPA 58.01.01.325.01 (b)]

#### STATE AND FEDERAL AIR QUALITY REQUIREMENTS CURRENTLY DETERMINED NOT APPLICABLE TO THE PERMITTEE

<u>Requirement</u>	<u>Reason Code</u>
<b>IDAPA Chapter 58.01.01:</b>	
Section 214 Preconstruction Requirements for Major HAP Sources	b
Section 336 Tier I Permits for Portable Sources	b
Section 500 Registration for Portable Equipment	b
Section 563-574 Transportation Conformity	b
Section 580 Classification of PSD Areas	i
Section 582 Conformity for Northern Ada County PM <sub>10</sub> Maintenance Area	d
Section 610-613 Industrial Flares, Residential Waste Fires, Landfill Site Fires, Orchard Fires	b
Section 626 Visible Emissions from Wigwam Burners	b
Section 776.02 Odors from Rendering Plants	b
Section 750-751 Control of Fluoride Emissions	a
Section 790-999 Rules for Specific Source Categories	b

#### **40CFR**

Part 49 Tribal Clean Air Authority	c
Part 51 Sections 51.1-51.45	i
Part 55 OCS Air Regulations	b
Part 56 Regional Consistency	i
Part 57 Nonferrous Smelter Rules	b
Part 59 VOC Standards for Consumer and Commercial Products	b
Part 60, except subparts A, Dc, and appendixes	b
Part 61, except subpart A, M, and appendixes	b
Part 62 Approval and Promulgation of State Plans for Designated Facilities and Pollutants	b
Part 63 National Emission Standards for Hazardous Air Pollutants other than ZZZZ (the facility is not subject to any Part 63 NESHAP other than Subpart ZZZZ)	j
Part 64 Compliance Assurance Monitoring (CAM)	g
Part 71 through 80	b
Part 82, except subpart F	b
Parts 85 through 94	b

#### Reason code definitions:

- a this pollutant is not emitted by the facility
- b the facility is not currently in this source category
- c the facility is not in a special control/nonattainment area
- d the facility is not in this county
- e the facility does not have this emissions unit
- f the facility does not use this fuel type
- g the facility does not have any emissions units which are subject to CAM requirements, as determined under 40 CFR 64.2
- h this method/procedure is not used by the facility
- i this rule applies only to DEQ and regional authorities
- j the facility is not subject to any Part 63 NESHAPS other than Subpart ZZZZ

## 14. GENERAL PROVISIONS

### **General Compliance**

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

### **Reopening**

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

### **Property Rights**

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

### **Information Requests**

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

### **Severability**

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

## **Changes Requiring Permit Revision or Notice**

- 14.10 The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.  
[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15); 40 CFR 70.7(d), (e)]
- 14.11 Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the Clean Air Act (CAA), 42 United States Code (U.S.C.) Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.  
[IDAPA 58.01.01.381-385, 4/5/00; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14), (15)]

## **Federal and State Enforceability**

- 14.12 Unless specifically identified as a "State only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.  
[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1), (2)]
- 14.13 Provisions specifically identified as a "State-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.  
[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

## **Inspection and Entry**

- 14.14 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- 14.14.1 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;
  - 14.14.2 Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - 14.14.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - 14.14.4 As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

## **New Applicable Requirements**

- 14.15 The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.  
[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

## **Fees**

- 14.16 The permittee shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.  
[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

## **Certification**

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

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

## **Renewal**

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

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

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

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

## **Permit Shield**

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

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

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

## **Compliance Schedule and Progress Reports**

14.21 The permittee shall comply with the following:

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

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

### **Periodic Compliance Certification**

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

- The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
- The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
  - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
  - The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
  - The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
  - Such information as DEQ may require to determine the compliance status of the emissions unit.

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

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

### ***False Statements***

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

### ***No Tampering***

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

### ***Semiannual Monitoring Reports***

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

### ***Reporting Deviations and Excess Emissions***

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

### ***Permit Revision Not Required***

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

### ***Emergency***

- 14.29 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)]

## APPENDIX A – PM10 EMISSIONS FACTORS

Production Process	Stack Identification Code	Emissions Factor	
		Emissions Factor	Units
Boilers	Boiler 1 – natural gas	0.009	lb-PM <sub>10</sub> /1,000 lbs steam
Boilers	Boiler 1 – #6 oil	0.071	lb-PM <sub>10</sub> /1,000 lbs steam
Boilers	Boiler 2 – natural gas	0.009	lb-PM <sub>10</sub> /1,000 lbs steam
Boilers	Boiler 2 – #6 oil	0.072	lb-PM <sub>10</sub> /1,000 lbs steam
Boilers	Boiler 3 – natural gas	0.010	lb-PM <sub>10</sub> /1,000 lbs steam
A	DHQ	0.015	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
A	DHT	0.110	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
A	DHU	0.110	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
A	DHZ	0.083	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
A	DKV	0.094	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
A	DKW	0.003	lb-TSP/1,000 lbs of unit process throughput (including mix back)
B	DXS	0.008	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DUO	0.008	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DPY	0.008	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DPZ	0.008	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DUQ	0.110	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DUT	0.110	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DQA	0.110	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DQB	0.110	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DUV	0.019	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DSO	0.046	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DSK	0.008	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DUY	0.003	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DUZ	0.003	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
B	DUU	0.004	lb-TSP/1,000 lbs of unit process throughput(including mixback)
B	DRY	0.004	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	ALB	0.055	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	ALQ	0.035	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	ALT	0.004	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	ALY	0.001	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	ALV	0.055	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	ALW	0.035	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	ALX	0.0004	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	AEV	0.055	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	AEW	0.039	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	AGQ	0.001	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CIR	0.076	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CHV	0.001	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	IBE	0.007	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CXX	0.343	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CYY	0.327	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CHX	0.190	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CHY	0.063	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CHZ	0.033	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	HEB	0.640	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	HNL	0.142	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CBB	0.101	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CNV	0.074	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CNW	0.075	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CTU	0.505	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput

Production Process	Stack Identification Code	Emissions Factor	
		Emissions Factor	Units
C	CTQ	0.081	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CTR	0.078	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CTS	0.024	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CTT	0.020	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
	CTZ	0.128	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	TCD	0.395	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	TCO	0.395	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	TAC	0.137	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	TAH	0.137	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	TEM	0.009	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	TEE	0.009	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	ENV	0.000	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	EUW	0.000	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	DSX	0.009	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CHI	0.009	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	CHK	0.009	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	EGS	0.002	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	EGT	0.002	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	ENR	0.002	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	EDO	0.002	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
C	FIF	0.002	lb-PM <sub>10</sub> /1,000 lbs of unit process throughput
Plant	Heaters	0.007	lb-PM <sub>10</sub> /MMBtu
Plant	Fugitive dust	3.220	lb-PM <sub>10</sub> /hr

## APPENDIX B – SO<sub>2</sub> EMISSIONS FACTORS

Production Process	Stack Identification Code	Process Related Emissions Factor		Combustion Related Emissions Factor	
		Emissions Factor	Units	Emissions Factor	Units
Boilers	Boiler 1 – natural gas	N/A	N/A	0.003	lb-SO <sub>2</sub> /1,000 lbs of steam
Boilers	Boiler 1 – #6 oil	N/A	N/A	0.563	lb-SO <sub>2</sub> /1,000 lbs of steam
Boilers	Boiler 2 – natural gas	N/A	N/A	0.003	lb-SO <sub>2</sub> /1,000 lbs of steam
Boilers	Boiler 2 – #6 oil	N/A	N/A	0.569	lb-SO <sub>2</sub> /1,000 lbs of steam
Boilers	Boiler 3 – natural gas	N/A	N/A	0.003	lb-SO <sub>2</sub> /1,000 lbs of steam
A	DHQ	N/A	N/A	N/A	N/A
A	DHT	0.005	lb-SO <sub>2</sub> / 1,000 lbs of unit process throughput	0.0024	lb-SO <sub>2</sub> / MMBtu
A	DHU	0.005	lb-SO <sub>2</sub> / 1,000 lbs of unit process throughput	0.0024	lb-SO <sub>2</sub> / MMBtu
A	DHZ	0.005	lb-SO <sub>2</sub> / 1,000 lbs of unit process throughput	0.0024	lb-SO <sub>2</sub> / MMBtu
B	DUQ	0.005	lb-SO <sub>2</sub> / 1,000 lbs of unit process throughput	0.0024	lb-SO <sub>2</sub> / MMBtu
B	DUT	0.005	lb-SO <sub>2</sub> / 1,000 lbs of unit process throughput	0.0024	lb-SO <sub>2</sub> / MMBtu
B	DQA	0.005	lb-SO <sub>2</sub> / 1,000 lbs of unit process throughput	0.0024	lb-SO <sub>2</sub> / MMBtu
B	DQB	0.005	lb-SO <sub>2</sub> / 1,000 lbs of unit process throughput	0.0024	lb-SO <sub>2</sub> / MMBtu
B	DUV	0.005	lb-SO <sub>2</sub> / 1,000 lbs of unit process throughput	0.0024	lb-SO <sub>2</sub> / MMBtu
B	DSO	0.005	lb-SO <sub>2</sub> / 1,000 lbs of unit process throughput	N/A	N/A
C	ALB	0.011	lb-SO <sub>2</sub> / 1,000 lbs of product	N/A	N/A
C	ALQ	0.011	lb-SO <sub>2</sub> / 1,000 lbs of product	N/A	N/A
C	ALV	0.011	lb-SO <sub>2</sub> / 1,000 lbs of product	N/A	N/A
C	ALW	0.011	lb-SO <sub>2</sub> / 1,000 lbs of product	N/A	N/A
C	AEV	0.011	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	AEW	0.011	lb-SO <sub>2</sub> / 1,000 lbs of product	N/A	N/A
C	AEW	0.011	lb-SO <sub>2</sub> / 1,000 lbs of product	N/A	N/A
C	CIR	0.11	lb-SO <sub>2</sub> / 1,000 lbs of product	N/A	N/A
C	CXX	0.058	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	CYY	0.061	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	CHX	0.019	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	CHY	0.007	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	CHZ	0.003	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	CTT	0.031	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	CTZ	0.032	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	TCD	0.080	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	TAC	0.020	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	TAH	0.020	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	TEM	0.020	lb-SO <sub>2</sub> / 1,000 lbs of product	N/A	N/A
C	TEE	0.020	lb-SO <sub>2</sub> / 1,000 lbs of product	N/A	N/A
Plant	Heaters	N/A	N/A	0.0024	lb-SO <sub>2</sub> / MMBtu
C	HEB	0.102	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	HNL	0.017	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	CBB	0.099	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	CNV	0.036	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	CNW	0.036	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu

Production Process	Stack Identification Code	Process Related Emissions Factor		Combustion Related Emissions Factor	
		Emissions Factor	Units	Emissions Factor	Units
C	CTU	0.166	lb-SO <sub>2</sub> / 1,000 lbs of product	N/A	N/A
C	CTQ	0.072	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	CTR	0.062	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu
C	CTS	0.026	lb-SO <sub>2</sub> / 1,000 lbs of product	0.0024	lb-SO <sub>2</sub> / MMBtu

## APPENDIX C – NOX EMISSIONS FACTORS

Production Process	Stack Identification Code	Emissions Factor	
		Annual Emissions Factor	Units
Boilers	Boiler 1 – natural gas	0.119	lb-NO <sub>x</sub> /1,000 lbs of steam
Boilers	Boiler 1 – #6 oil	0.769	lb-NO <sub>x</sub> /1,000 lbs of steam
Boilers	Boiler 2 – natural gas	0.120	lb-NO <sub>x</sub> /1,000 lbs of steam
Boilers	Boiler 2 – #6 oil	0.777	lb-NO <sub>x</sub> /1,000 lbs of steam
Boilers	Boiler 3 – natural gas	0.128	lb-NO <sub>x</sub> /1,000 lbs of steam
A	DHQ	N/A	N/A
A	DHT	0.077	lb-NO <sub>x</sub> /MMBtu
A	DHU	0.077	lb-NO <sub>x</sub> /MMBtu
A	DHZ	0.051	lb-NO <sub>x</sub> /MMBtu
B	DUQ	0.077	lb-NO <sub>x</sub> /MMBtu
B	DUT	0.077	lb-NO <sub>x</sub> /MMBtu
B	DQA	0.077	lb-NO <sub>x</sub> /MMBtu
B	DQB	0.077	lb-NO <sub>x</sub> /MMBtu
B	DUV	0.051	lb-NO <sub>x</sub> /MMBtu
C	AEV	0.051	lb-NO <sub>x</sub> /MMBtu
C	CXX	0.054	lb-NO <sub>x</sub> /MMBtu
C	CYY	0.047	lb-NO <sub>x</sub> /MMBtu
C	CHX	0.078	lb-NO <sub>x</sub> /MMBtu
C	CHY	0.078	lb-NO <sub>x</sub> /MMBtu
C	CHZ	0.078	lb-NO <sub>x</sub> /MMBtu
C	HEB	0.027	lb-NO <sub>x</sub> /MMBtu
C	HNL	0.027	lb-NO <sub>x</sub> /MMBtu
C	CBB	0.051	lb-NO <sub>x</sub> /MMBtu
C	CNV	0.051	lb-NO <sub>x</sub> /MMBtu
C	CNW	0.051	lb-NO <sub>x</sub> /MMBtu
C	CTQ	0.051	lb-NO <sub>x</sub> /MMBtu
C	CTR	0.051	lb-NO <sub>x</sub> /MMBtu
C	CTS	0.051	lb-NO <sub>x</sub> /MMBtu
C	CTT	0.051	lb-NO <sub>x</sub> /MMBtu
C	CTZ	0.051	lb-NO <sub>x</sub> /MMBtu
C	TCD	0.051	lb-NO <sub>x</sub> /MMBtu
C	TAC	1.051	lb-NO <sub>x</sub> /MMBtu
C	TAH	2.051	lb-NO <sub>x</sub> /MMBtu
Plant	Heaters	0.098	lb-NO <sub>x</sub> /MMBtu

## APPENDIX D – CO EMISSIONS FACTORS

Production Process	Stack Identification Code	Emissions Factor	
		Emissions Factor	Units
Boilers	Boiler 1 – natural gas	0.100	lb-CO/1,000 lbs steam
Boilers	Boiler 1 – #6 oil	0.105	lb-CO/1,000 lbs steam
Boilers	Boiler 2 – natural gas	0.101	lb-CO/1,000 lbs steam
Boilers	Boiler 2 – #6 oil	0.106	lb-CO/1,000 lbs steam
Boilers	Boiler 3 – natural gas	0.107	lb-CO/1,000 lbs steam
A	DHT	0.400	lbs-CO/MMBtu
A	DHU	0.400	lbs-CO/MMBtu
A	DHZ	0.260	lbs-CO/MMBtu
B	DUQ	0.400	lbs-CO/MMBtu
B	DUT	0.400	lbs-CO/MMBtu
B	DQA	0.400	lbs-CO/MMBtu
B	DQB	0.400	lbs-CO/MMBtu
B	DUV	0.260	lbs-CO/MMBtu
C	AEV	0.260	lbs-CO/MMBtu
C	DHZ	0.260	lbs-CO/MMBtu
C	CXX	0.254	lbs-CO/MMBtu
C	CYY	0.313	lbs-CO/MMBtu
C	CHX	0.182	lbs-CO/MMBtu
C	CHY	0.182	lbs-CO/MMBtu
C	CHZ	0.182	lbs-CO/MMBtu
C	HEB	0.043	lbs-CO/MMBtu
C	HNL	0.043	lbs-CO/MMBtu
C	CBB	0.260	lbs-CO/MMBtu
C	CNV	0.260	lbs-CO/MMBtu
C	CNW	0.260	lbs-CO/MMBtu
C	CTQ	0.260	lbs-CO/MMBtu
C	CTR	0.260	lbs-CO/MMBtu
C	CTS	0.260	lbs-CO/MMBtu
C	CTT	0.260	lbs-CO/MMBtu
C	TCD	0.260	lbs-CO/MMBtu
C	TAC	0.260	lbs-CO/MMBtu
C	TAH	0.260	lbs-CO/MMBtu
Plant	Heaters	0.082	lbs-CO/MMBtu

## APPENDIX E – VOC EMISSIONS FACTORS

Production Process	Stack Identification Code	Emissions Factor	
		Emissions Factor	Units
Boilers	Boiler 1 – natural gas	0.007	lb-VOC/1,000 lbs steam
Boilers	Boiler 1 – #6 oil	0.002	lb-VOC/1,000 lbs steam
Boilers	Boiler 2 – natural gas	0.007	lb-VOC/1,000 lbs steam
Boilers	Boiler 2 – #6 oil	0.002	lb-VOC/1,000 lbs steam
Boilers	Boiler 3 – natural gas	0.007	lb-VOC/1,000 lbs steam
A	DHT	0.0054	lb-VOC/MMBtu
A	DHU	0.0054	lb-VOC/MMBtu
A	DHZ	0.0054	lb-VOC/MMBtu
B	DUQ	0.0054	lb-VOC/MMBtu
B	DUT	0.0054	lb-VOC/MMBtu
B	DQA	0.0054	lb-VOC/MMBtu
B	DQB	0.0054	lb-VOC/MMBtu
B	DUV	0.0054	lb-VOC/MMBtu
C	AEV	0.0054	lb-VOC/MMBtu
C	CXX	0.0054	lb-VOC/MMBtu
C	CYY	0.0054	lb-VOC/MMBtu
C	CHX	0.0054	lb-VOC/MMBtu
C	CHY	0.0054	lb-VOC/MMBtu
C	CHZ	0.0054	lb-VOC/MMBtu
C	HEB	0.0054	lb-VOC/MMBtu
C	HNL	0.0054	lb-VOC/MMBtu
C	CBB	0.0054	lb-VOC/MMBtu
C	CNV	0.0054	lb-VOC/MMBtu
C	CNW	0.0054	lb-VOC/MMBtu
C	CTQ	0.0054	lb-VOC/MMBtu
C	CTR	0.0054	lb-VOC/MMBtu
C	CTS	0.0054	lb-VOC/MMBtu
C	CTT	0.0054	lb-VOC/MMBtu
C	TCD	0.0054	lb-VOC/MMBtu
C	TAC	0.0054	lb-VOC/MMBtu
C	TAH	0.0054	lb-VOC/MMBtu
Plant	Heaters	0.0054	lb-VOC/MMBtu

## APPENDIX F – LEAD EMISSIONS FACTORS

Production Process	Stack Identification Code	Emissions Factor	
		Emissions Factor	Units
Boiler 1	Boiler 1	4.50E-06	lb-Pb/MMBtu
Boiler 2	Boiler 2	4.50E-06	lb-Pb/MMBtu
Boiler 3	Boiler 3	9.0E-06 (hourly), 6.2E-06 (quarterly), 1.9E-06 (annually),	lb-Pb/MMBtu
A	DHT	4.9E-07	lb-Pb/MMBtu
A	DHU	4.9E-07	lb-Pb/MMBtu
A	DHZ	4.9E-07	lb-Pb/MMBtu
B	DUQ	4.9E-07	lb-Pb/MMBtu
B	DUT	4.9E-07	lb-Pb/MMBtu
B	DQA	4.9E-07	lb-Pb/MMBtu
B	DQB	4.9E-07	lb-Pb/MMBtu
B	DUV	4.9E-07	lb-Pb/MMBtu
C	AEV	4.9E-07	lb-Pb/MMBtu
C	CXX	4.9E-07	lb-Pb/MMBtu
C	CYY	4.9E-07	lb-Pb/MMBtu
C	CHX	3.2E-07	lb-Pb/MMBtu
C	CHY	1.2E-07	lb-Pb/MMBtu
C	CHZ	5.5E-07	lb-Pb/MMBtu
C	HEB	3.8E-07	lb-Pb/MMBtu
C	HNL	1.1E-07	lb-Pb/MMBtu
C	CBB	4.9E-07	lb-Pb/MMBtu
C	CNV	4.9E-07	lb-Pb/MMBtu
C	CNW	4.9E-07	lb-Pb/MMBtu
C	CTQ	4.9E-07	lb-Pb/MMBtu
C	CTR	4.9E-07	lb-Pb/MMBtu
C	CTS	4.9E-07	lb-Pb/MMBtu
C	CTT	4.9E-07	lb-Pb/MMBtu
C	TCD	4.9E-07	lb-Pb/MMBtu
C	TAC	2.5E-07	lb-Pb/MMBtu
C	TAH	2.5E-07	lb-Pb/MMBtu
Plant	Heaters	0.0E+00	lb-Pb/MMBtu

**APPENDIX G – EPA APPROVAL OF NSPS SUBPART DC ALTERNATIVE TO COMS**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, WA 98101

Reply To  
Att: AWT - 107

29 SEP 2005

Mr. Bruce Wright  
Sr. Project Manager, Environmental  
Basic American Foods  
415 W Collins Road  
Blackfoot, Idaho 83221-5668

Re: NSPS Subpart Dc Alternative to COMS for Boiler Re-firing Project at Blackfoot, Idaho

Dear Mr. Wright:

This alternative monitoring determination is in response to a request sent to the Environmental Protection Agency (EPA) by Basic American Foods (BAF) submitted on August 8, 2005, and followed up with more information submitted by the Idaho Department of Environmental Quality (IDEQ) dated September 16, 2005. BAF and IDEQ are requesting approval of an alternative plan for monitoring opacity in lieu of a Continuous Opacity Monitoring System (COMS). A COMS will not provide accurate measurements due to water vapor from a proposed wet scrubber. EPA approves the alternative monitoring plan as described in the September 16, 2005, letter from IDEQ and as detailed below.

#### Background

The proposed project at the BAF Blackfoot facility involves two boilers (Boilers 1 and 2) neither of which are currently subject to New Source Performance Standards (NSPS). The status for boilers 1 and 2 before the proposed change is as follows:

- Boiler 1 has a heat input of 57 MM Btu/hr when firing natural gas.
  - Currently Boiler 1 is also permitted to combust up to 5,450 gallons/day of No. 6 residual fuel oil or No. 2 diesel fuel oil, uncontrolled.
  - This results in annual sulfur dioxide (SO<sub>2</sub>) emissions of 250 tons per year (TPY).
- Boiler 2 has a heat input of 71.5 MM Btu/hr when firing natural gas.
  - Currently Boiler 2 is also permitted to combust low sulfur (0.05 weight percentage sulfur) No. 2 diesel fuel oil at full fire for up to 60 day/yr, uncontrolled.
  - This results in annual SO<sub>2</sub> emissions of 2.8 TPY.

BAF plans to modify Boiler 2 in order to enable it to combust No. 6 residual fuel oil. This modification will make Boiler 2 subject to 40 CFR Part 60, Subpart Dc the Standards of

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Performance for Small Industrial-Commercial-Institutional Steam Generating Units (Subpart Dc) and the NSPS General provisions in 40 CFR Part 60 Subpart A (General Provisions).

In order to avoid applicability to the Prevention of Significant Deterioration (PSD) permitting process, BAF has proposed the following:

- BAF will limit the amount of residual oil combusted and the quantity of steam produced per hour as proscribed in a federally enforceable permit issued by IDEQ, and
- BAF will install controls in the form of a venturi-type wet scrubber that will control the emissions from both boilers.

The control of emissions will be accomplished by merging the exhausts from Boiler 1 and Boiler 2, scrubbing the merged exhaust stream with a single venturi-type wet scrubber, and venting the scrubbed steam through the existing stack for Boiler 1. BAF estimates that the combined controlled SO<sub>2</sub> emissions from both boilers are not expected to exceed 145 TPY. This would represent a reduction of 65 TPY compared to the uncontrolled SO<sub>2</sub> emissions currently allowed for Boiler 1 alone. The wet scrubber will also reduce particulate matter emissions with a capture efficiency of at least 50 percent.

#### Determination

Because Boiler 2 will be modified and become subject to NSPS Subpart Dc and the General provisions, the COMS requirement in 40 CFR §60.47c(a) of Subpart Dc is now applicable to Boiler 2. This requirement specifies that a COMS must be installed to measure and record the opacity when Boiler 2 fires fuel oil. In lieu of the COMS, BAF has requested to implement alternative opacity monitoring requirements according to the provisions of 40 CFR 60.11(h)(1). This section allows the applicant to submit a written application for alternative opacity monitoring requirements when "installation of a continuous emission monitoring system or monitoring device specified by this part would not provide accurate measurement due to liquid water or other interferences caused by substances with the effluent gasses." EPA has previously approved similar requests, which are posted on the EPA's applicability determination index (see EPA Determination Control No. 000010 and Control No. 030073). In previous requests EPA has determined that the continuous monitoring of the scrubbing liquid flow rate and the pressure drop of the gas stream across the scrubber is acceptable as alternative monitoring to the COMS.

In lieu of operating a COMS as is required by 40 CFR §60.47c(a), IDEQ has recommended and BAF has agreed to the following alternative monitoring requirements for Boiler 2.

1. BAF's permit to construct (PTC) No. P-050301 will require all of the following: The wet scrubbing system shall be operated during all times that residual oil is fired in Boiler 2. Basic American Foods shall install, calibrate, operate, and maintain equipment to measure each of the following operating parameters for the wet scrubbing system. Each of the following operating parameters shall be maintained within the specifications established in the permit or specifications established through source testing under worst case normal conditions:

- a) Pressure drop across the scrubber
  - b) Scrubbing solution pH
  - c) Scrubbing solution flow rate
  - d) Fuel consumption
  - e) Steam production (calculated)
2. Basic American Foods shall calibrate each instrument in accordance with the manufacturer's recommendation; nevertheless, Basic American Foods shall calibrate each piece of equipment at least every six months. Each calibration for each piece of equipment shall be recorded and available for inspection in accordance with the terms of the permit. The facility noted that the equipment might be self-calibrating. In this case, manufacturer's documentation of the self-calibration will be required to be kept on site and available for inspection.
  3. Section 4.5 of the PTC will reference this alternative monitoring plan. This section of the plan references the permit. If a change to the permit will affect this plan, Basic American Foods shall request a change to this monitoring plan and a change to the permit. If a change to this plan will not affect the permit, only a change to this plan is required to be requested. When a permit change is requested that will not affect this plan, only the permit change is required to be requested. This requirement is to ensure the monitoring plan and the permit remain consistent as future changes are made to either the permit or this monitoring plan.
  4. Basic American Foods shall continuously monitor the scrubbing liquid flow rate and the pressure drop of the gas stream across the scrubber serving Boiler 2 whenever Boiler 2 combusts fuel oil. Once per hour, Basic American Foods shall record the hourly average scrubbing liquid flow rate and pressure drop of the gas stream. Note that Boiler 1 is not subject to the NSPS; therefore, this requirement does not apply to Boiler 1, except when Boiler 1 operates simultaneously when Boiler 2 combusts fuel oil.
  5. Basic American Foods shall conduct a 6-minute opacity observation every day for days 1-14 of operation when Boiler 2 combusts fuel oil to monitor directly the opacity of emissions from the stack. Thereafter, Basic American Foods shall conduct a 6-minute opacity observation once every 14 days for days 15-45 of operation when Boiler 2 combusts fuel oil to directly monitor the opacity of emissions from the stack. Thereafter, Basic American Foods shall conduct a 6-minute opacity observation once every 30 days for days of operation from day 46 when Boiler 2 combusts fuel oil to directly monitor the opacity of emissions from the stack. Opacity observations shall be conducted utilizing Method 9. Note that Boiler 1 is not subject to the NSPS; therefore, this requirement does not apply to Boiler 1, except when Boiler 1 operates simultaneously when Boiler 2 combusts fuel oil. To clarify, there will be fourteen (14) data points according to the first requirement, two (2) data points in accordance with the second requirement, and one (1) data point every 30 days thereafter when Boiler 2 combusts fuel oil.
  6. If any 6-minute opacity observation results in any single observation greater than 20%, Basic American Foods shall conduct a 60-minute Method 9 opacity observation. If the 60 minute opacity observation results in opacity greater than 20% for any 6-minute period, except for

one 6-minute period (average) of not more than 27% opacity, then Basic American Foods shall revert back to the start of the schedule outlined above in item number 5 (i.e., collecting fourteen (14) data points according to the first requirement, two (2) data points in accordance with the second requirement, and one (1) data point every 30 days thereafter when Boiler 2 combusts fuel oil.)

7. Basic American Foods shall maintain records of the scrubbing liquid flow rate, the pressure drop of the gas stream across the scrubber, fuel usage, steam generation, and opacity observations in accordance with the terms of the permit. If the opacity exceeds 20%, Basic American Foods shall take immediate corrective action to reduce the opacity. Opacity observations and corrective actions shall be documented hourly when opacity is greater than 20%.
8. In accordance with 40 CFR 70.6(a)(3)(iii), BAF shall submit reports of excess emissions semiannually to IDEQ. All reports shall be postmarked within 30 days following the end of the reporting period. These are the initial start-up parameters to be confirmed by the initial source test<sup>1,2</sup>:
  - a) any period when the 1-hour average scrubbing liquid flow rate is less than 323 gallons per minute;
  - b) any period when the 1-hour average pressure drop of the gas stream across the scrubber is less than 10 inches of water column or more than 15 inches of water column; and
  - c) any period when the Method 9 opacity exceeds 20% (6-minute average), except for one six-minute average per hour of not more than 27% opacity.

BAF shall conduct Method 9 observations to verify limits for the prescribed scrubber operating parameters. Scrubber operating parameters and Method 9 observations shall be collected over a three-hour period while the boiler is operating under normal conditions and in compliance with the 20% opacity standard.

9. Paragraph 3.7 of BAF's PTC No. P-050301 includes the following: "Within 60 days after startup of the wet scrubbing system, the permittee shall have developed an O&M manual for the wet scrubbing system which describes the procedures that will be followed to comply with the PTC General Provisions and manufacturers specifications for the air pollution control device. At a minimum, the following items shall be addressed in the manual:
  - Inspection checklists for items that will be periodically inspected while the treatment system is operating, including frequency of inspection.
  - Inspection checklist for items that will be inspected when the device is taken out of operation and physically opened for inspection (e.g., internal components), including frequency of these internal inspections.

<sup>1</sup> Operating outside these initial start-up limits, except during performance testing, shall be considered excess emissions until the performance tests confirm the different operating limits.

<sup>2</sup> Operating parameters may be modified upon completion of testing that demonstrates compliance with emissions limits.

- Periodic planned maintenance for the control devices, including the burner itself.

EPA has found that the above proposed alternative monitoring is at least as protective as previously approved requests in similar circumstances, where the operation of a wet scrubbing control device necessitates alternative monitoring in lieu of COMS. Therefore, EPA determines that the proposed alternative monitoring described above is acceptable in lieu of COMS for Boiler 2. If there are any changes in operation from what is described here, this determination is no longer valid. If you have any further questions or concerns, please contact Heather Valdez of the Region 10 Office of Air, Waste, and Toxics at (206) 553-6220.

Sincerely,



Jeff KenKnight, Manager  
Federal and Delegated Air Programs Unit  
Office of Air, Waste, and Toxics

cc: Pete Wagner, IDHQ PRO  
Dan Pittman, IDEQ, State Office  
Ken Hanna, IDEQ, State Office