

Statement of Basis

Tier I Operating Permit No. T1-2012.0066

Project ID 61126

**Rexburg Facility of Basic American Foods, A Division of Basic American, Inc.
Rexburg, Idaho**

Facility ID 065-00008

Final



July 18, 2013

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Permit Writer

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

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

1. INTRODUCTION AND APPLICABILITY	5
2. FACILITY INFORMATION	6
3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY	8
4. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY	8
5. EMISSIONS LIMITS AND MRRR	12
6. GENERAL PROVISIONS	38
7. REGULATORY REVIEW	43
8. PUBLIC COMMENT	53
9. EPA REVIEW OF PROPOSED PERMIT	53

APPENDIX A – EMISSIONS INVENTORY

APPENDIX B – FACILITY COMMENTS FOR DRAFT PERMIT

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

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

PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTE	potential to emit
PW	process weight rate
RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T1	Tier I operating permit
T2	Tier II operating permit
TAP	toxic air pollutants
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
ULSD	ultra low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compound

1. INTRODUCTION AND APPLICABILITY

Rexburg Facility of Basic American Foods, A Division of Basic American, Inc. (BAF) is a manufacturer of dried food products, and is located at 40 East 7th North, Rexburg. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c because it emits or has the potential to emit PM₁₀, NO_x, CO, and SO₂ above the major source threshold of 100 tons-per-year. At the time of this permitting action, the facility is not a major source of HAP emissions.

(IDAPA 58.01.01.314.09).

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

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

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

Section 1 - Tier I Operating Permit Scope

The scope describes this permitting action.

Section 2 - Facility-Wide Conditions

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

Sections 3 through 5 - Emissions Unit/Source Name

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

Sections 9 and 10 - Non-applicable Requirements and Insignificant Activities

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

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

Section 11 - General Provisions

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

2. FACILITY INFORMATION

2.1 Facility Description

The Rexburg Facility of Basic American Foods, a Division of Basic American, Inc. (BAF Rexburg) facility produces a variety of dehydrated food products for both internal use and for external customers. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. BAF Rexburg uses a variety of dehydration technologies to produce products to meet exacting customer specifications. The main sources of air emissions include boilers, dryers, dehydration lines, pneumatic material transfer, and packaging operations. Steam for plant operations is provided by boiler numbers 1 and 2 and the Kipper & Sons boiler.

Materials transport occurs both internally within a processing activity and externally to transfer materials between processes, to place them into or take them out of bulk storage, or to transport them to packaging and load-out activities. BAF Rexburg uses air suspension systems to transport granules and most formulated products; these suspension processes include air slides and pneumatic bulk transfer operations. BAF Rexburg also uses belt and bucket conveyors at various locations in its operations to transport raw materials, products in processing, and finished products. All bucket and belt conveyors are entirely contained within enclosed buildings. BAF Rexburg also uses wet flumes to transport raw potatoes. Forklifts are used to transfer tote containers within the plant. Materials recovery units (primarily cyclones and baghouses) are integral to the operation of all unit processes in which granules or formulated products are suspended in air.

BAF Rexburg operates packaging equipment to fill product containers with bulk product. Spices and flavoring may be added to the bulk product during the packaging process. Dust pickups located within the packaging area exhaust to the atmosphere through baghouses.

Raw materials are received on site by truck. Granules can be received by rail as well as by truck. All shipments are by rail or truck. Trucks are also used to move potatoes to and from the onsite cellars.

Plant process heating is provided by both direct firing with natural gas and indirect heating using steam supplied by facility boilers. Plant space heating is by natural gas.

Plant products are described as follows.

Dehydrated potato granules

Potato granules are individual potato cells prepared from raw potatoes by cooking, followed by gentle drying. Granules typically range from 50 to 120 microns in size. Most of the granules produced at the Shelley Plant are used at the Shelley Plant; occasionally granules are shipped to other BAF Rexburg plants for use in products produced at those plants.

Dehydrated piece food products

BAF Rexburg prepares dehydrated piece food products by dehydrating cooked and/or blanched foods. These foods can be either whole vegetables or vegetable pieces. Piece products range up to several inches in diameter.

Food processing byproducts

Sellable food fractions and off-specification materials that are not suitable for use in other products are produced as by-products of plant processes. BAF Rexburg uses various materials classification processes to segregate, collect, and transport these byproducts. Food byproducts are transferred directly to load-out operations after collection without further processing beyond collection.

Air suspension unit processes are also used to classify materials and to remove unsuitable fractions from the production stream.

Food processing by-products are produced from food fractions that are not suitable for sale as primary products.

2.2 Facility Permitting History

Tier I Operating Permit History - Previous 5-year permit term April 16, 2008 to April 16, 2013

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from April 16, 2008 to April 16, 2013. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

October 5, 2012	T1-2008.0110, Administrative amendment of existing Tier I operating permit to include the requirements of P-2011.0132, Permit status (A, but will be superseded with issuance of this permit)
June 1, 2012	P-2011.0132, project 60943, converting the existing Tier II permit T2-2008.0109 into a Permit to Construct (A)
October 8, 2008	T2-2008.0109, Permit to include existing requirements for the facility's Kipper boiler, and to also satisfy PTC requirements for new or modified sources that potentially required a PTC, but for which a PTC was not obtained prior to construction, Permit status (S)
June 10, 2008	T1-2008.0053, Tier I Operating Permit Modification – Incorporate Tier II Operating Permit No. T2-030515, Permit status (S)
June 10, 2008	T2-030515, Facility-wide Tier Operating Permit and Permit to Construct, Permit status (S)
April 16, 2008	T1-060513, Tier I Operating Permit Renewal, Permit status (S)

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

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

June 1, 2012	P-2011.0132, project 60943, converting the existing Tier II permit T2-2008.0109 into a Permit to Construct (A)
October 8, 2008	T2-2008.0109, Permit to include existing requirements for the facility's Kipper boiler, and to also satisfy PTC requirements for new or modified sources that potentially required a PTC, but for which a PTC was not obtained prior to construction, Permit status (S)
June 10, 2008	T1-2008.0053, Tier I Operating Permit Modification – Incorporate Tier II Operating Permit No. T2-030515, Permit status (S)
June 10, 2008	T2-030515, Facility-wide Tier Operating Permit and Permit to Construct, Permit status (S)
April 16, 2008	T1-060513, Tier I Operating Permit Renewal, Permit status (S)
December 11, 2002	Initial Tier I Operating Permit No. 065-00008 issued, Permit status (S)
May 8, 1984	PTC Letter was amended to clarify coal/wood input limits, Permit status (S)
April 30, 1981	PTC Letter was amended to revise test dates, Permit status (S)
July 30, 1980	PTC Letter (no number assigned) for the Kipper & Sons boiler issued, Permit status (S)

3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

3.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit.

3.2 Application Chronology

October 17, 2012	DEQ received an application.
December 11, 2012	DEQ determined that the application was complete.
February 12, 2013	DEQ made available the draft permit and statement of basis for peer and regional office review.
February 15, 2013	DEQ made available the draft permit and statement of basis for applicant review.
June 11 – July 11, 2013	DEQ provided a public comment period on the proposed action.
July 16, 2013	DEQ provided the proposed permit and statement of basis for EPA review.

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

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

4.1 Process No. 1 - PROCESS DESCRIPTION

Table 4.1 lists the emissions units and control devices associated with the Kipper & Sons boiler.

Table 4.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)
Kipper & Sons Boiler	Manufacturer: Kipper & Sons Model: N/A S/N: 1300 Heat input rating: 90.0 MMBtu/hr Maximum steam production rate: 65,000 lb/hr Fuels: Coal (maximum 50% of heat input) and wood Date installed: 1981	Zurn multiclone and Riley Ventri-rod® scrubber

The Kipper boiler is a wood and coal-fired boiler with an original steam production rating of 60,000 pounds per hour. The boiler can burn up to 39% coal on a fuel weight basis (i.e. 50% of the heating value). The Kipper boiler was installed in 1981, and an economizer was added in 2001, increasing the maximum steam production rate to 65,000 lb/hr due to increased boiler efficiency. Emission controls on the Kipper boiler include a Zurn multiclone dust collector and a Riley Ventri-Rod® scrubber.

Wood materials combusted in the Kipper Boiler are either "clean cellulosic biomass" (as defined in 40 CFR 241.2) or are fuels produced from the processing of discarded non-hazardous secondary materials and that meet the legitimacy criteria specified in 40 CFR 241.3(d)(1).

4.2 Process No. 2 - PROCESS DESCRIPTION

Table 4.2 lists the emissions units and control devices associated with Boiler 1.

Table 4.2 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)
Boiler 1	Manufacturer: Erie City Model: Not given on Boiler Name Plate S/N: 96047 Heat input rating: 52 MMBtu/hr (Not given on Boiler Name Plate) Maximum steam production rate: 40,000 lb/hr Fuels: Natural gas only Date installed: Prior to 1965	None

4.3 Process No. 3 - PROCESS DESCRIPTION

Table 4.3 lists the emissions units and control devices associated with Boiler 2.

Table 4.3 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)
Boiler 2	Manufacturer: Murray Model: MCF3-43 S/N: 10509 Heat input rating: 49.9 MMBtu/hr Maximum steam production rate: 40,000 lb/hr Fuels: Natural gas only Date installed: 2010	None

4.4 Process No. 4 - PROCESS DESCRIPTION

Table 4.4 lists the non-insignificant emissions units and control devices associated with Process A.

Table 4.4 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)
7020	Cooler/Dryer 7020 (Cooler vent)	None
7102	Cooler/Dryer 7102 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None
7019	Cooler/Dryer 7019 (Dryer, 6.6 MMBtu/hr, steam and natural gas)	None
7001	Cooler/Dryer 7001 (Dryer, steam-heated)	None

The Basic American Foods Rexburg facility produces a variety of dehydrated food products for external customers and for internal use. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. Raw materials into the process are cooked potatoes, cooked foods, dehydrated foods, and additives, including sulfites. The processes addressed by this section are listed in Table 5 and include coolers, dryers, dehydration lines, and material transfer systems. Emissions of PM from each of these sources are uncontrolled. Material Recovery Units (MRUs), in the form of cyclones and fabric filters, are integral process equipment used to separate the pneumatically conveyed product from the air stream. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers. Process A was constructed in the early 1960's.

4.5 Process No. 5 - PROCESS DESCRIPTION

Table 4.5 lists the non-insignificant emissions units and control devices associated with Process B.

Table 4.5 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)
5037	Cooler/Dryer 5037 (Cooler/dryer vent, dryer is steam heated)	None
4000	Cooler/Dryer 4000 (Dryer, steam heated)	None
228	Cooler/Dryer 228 (Dryer, natural gas-fired, 16.1 MMBtu/hr)	None
234	Cooler/Dryer 234 (Second exhaust from dryer 228)	None
410/411	Cooler/Dryer 410/411 (Dryer vent, steam-heated)	None
311	Cooler/Dryer 311 (Dryer vent, steam-heated)	None
312	Cooler/Dryer 312 (Dryer vent, steam-heated)	None
638	Cooler/Dryer 638 (Dryer vent, steam-heated)	None
613/614	Cooler/Dryer 613/614 (Dryer vent, steam heated)	None
615/616	Cooler/Dryer 615/616 (Dryer vent, steam heated)	None

The Basic American Foods Rexburg facility produces a variety of dehydrated food products for external customers and for internal use. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. Raw materials into the process are cooked potatoes, cooked foods, dehydrated foods, and additives, including sulfites. The processes addressed by this section are listed in Table 7 and include coolers, dryers, dehydration lines, and material transfer systems. Emissions of PM from each of these sources are uncontrolled. Material Recovery Units (MRUs), in the form of cyclones and fabric filters, are integral process equipment used to separate the pneumatically conveyed product from the air stream. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

4.6 Process No. 6 - PROCESS DESCRIPTION

The BAF Rexburg Facility has natural gas-fired space heaters ranging in size from less than 100,000 Btu/hr to 8.8 MMBtu/hr. At the time of permit issuance, total space heater combustion capacity is 30.8 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. Because the heaters do not have discreet exhaust stacks, all heaters are aggregated together and treated as a single source.

Table 4.6 lists the emissions units and control devices associated with the natural gas-fired space heaters.

Table 4.6 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)
	Natural gas-fired space heaters	None

4.7 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity was identified in the permit application.

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

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

Rule	Basis
GHG Tailoring Rule	Rexburg Facility total GHG emissions are limited by permit to no more than 99,000 tpy. This is below the 100,000 tpy threshold applicability limit for the GHG tailoring rule.
Major Source MACT for Boilers and Process Heaters (40 CFR 63 Subpart DDDDD)	This rule is applicable to boilers and process heaters located at major sources of Hazardous Air Pollutants (HAPs). Because the Rexburg Facility is not a major source of HAPs, Subpart DDDDD is not applicable.
Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Is Commenced After November 30, 1999 or for Which Modification or Reconstruction Is Commenced on or After June 1, 2001 (40 CFR 60 Subpart CCCC)	This rule is not applicable because the boilers at the Rexburg Facility do not combust any materials which are classed as solid waste for which construction, modification, or reconstruction commenced after the applicability dates established by this rule.
Emissions Guiderines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units (40 CFR 60 Subpart DDDD)	This rule, which is to be implemented by either modifying a State Implementation Plan or by creating a Federal Implementation. is not applicable because all non-hazardous secondary materials combusted at the Rexburg Facility are not classed as solid waste per 40 CFR 241.3.

4.9 Emissions Inventory

Table 4.7 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

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

Table 4.7 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)

Source Description	PM ₁₀ T/yr	NO _x T/yr	SO ₂ T/yr	CO T/yr	VOC T/yr	Lead T/yr	HAP T/yr	GHG CO ₂ e T/yr
Kipper & Sons Boiler	71.2	123.2	214.0	263.9	12.9	0.0189	8.56	76,831
Boiler 1	1.70	22.33	0.54	18.76	1.23	0.000112	0.42	26,649
Boiler 2	1.63	21.43	0.51	18.00	1.18	0.000107	0.40	25,573
Cooler/Dryer 7020	1.82	---	---	---	---	NA	0	NA
Cooler/Dryer 7101	9.47	1.42	0.51	7.40	0.15	0.000014	0.05	3,331
Cooler/Dryer 7102	9.47	1.42	0.51	7.40	0.15	0.000014	0.05	3,331
Cooler/Dryer 7019	3.48	1.45	0.96	7.52	0.16	0.0000142	0.05	3,382
Cooler/Dryer 7001	1.03	---	0.11	---	---	NA	0	NA
Cooler/Dryer 7027	0.18	---	---	---	---	NA	0	NA
Material Recovery Unit 7006	0.54	---	---	---	---	NA	0	NA
Material Recovery Unit 5034	0.07	---	---	---	---	NA	0	NA
Cooler/Dryer 5037	5.66	---	8.19	---	---	NA	0	NA
Cooler/Dryer 4000	7.53	---	1.14	---	---	NA	0	NA
Cooler/Dryer 228	4.80	2.12	0.84	11.00	0.23	0.0000207	0.08	4,951
Cooler/Dryer 234	1.37	1.41	0.28	7.33	0.15	0.0000138	0.05	3,300
Cooler/Dryer 410/411	2.57	---	0.39	---	---	NA	0	NA
Cooler/Dryer 311	1.28	---	0.20	---	---	NA	0	NA
Cooler/Dryer 312	1.28	---	0.20	---	---	NA	0	NA
Cooler/Dryer 638	1.05	---	0.16	---	---	NA	0	NA
Cooler/Dryer 613/614	4.80	---	0.74	---	---	NA	0	NA
Cooler/Dryer 615/616	3.74	---	0.56	---	---	NA	0	NA
Material Recovery Unit 707	0.01	---	---	---	---	NA	0	NA
Material Recovery Unit 725	0.21	---	---	---	---	NA	0	NA
Material Recovery Unit 8	0.21	---	---	---	---	NA	0	NA
Material Recovery Unit 5001	1.07	---	---	---	---	NA	0	NA
Material Recovery Unit 5000	0.21	---	---	---	---	NA	0	NA
Material Recovery Unit 432	0.21	---	---	---	---	NA	0	NA
Material Recovery Unit 322	0	---	---	---	---	NA	0	NA
Material Recovery Unit 572	0.25	---	---	---	---	NA	0	NA
Woodpile	7.04	---	---	---	14.92	NA	0	NA
Heaters	0.50	3.37	0.32	17.54	0.36	0.0000331	0.12	7,892
Total Emissions	144	178	0.56	230	359	31	0.02	155240

5. EMISSIONS LIMITS AND MRRR

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

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable

requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Kipper Boiler Emissions Limits;
- Boilers 1 & 2 Emissions Limits;
- Process A Emissions Limits;
- Process B Emissions Limits;
- Plant Space Heaters Emissions Limits;
- Carbon Monoxide Emissions Limits;
- Tier I Operating Permit General Provisions.

MRRR

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

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

State Enforceability

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

Federal Enforceability

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

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

5.1 Facility-Wide Conditions

Permit Condition 2.1 - Fugitive Dust

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

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

MRRR (Permit Conditions 2.2 through 2.4)

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

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

Permit Condition 2.5 - Odors

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

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

MRRR (Permit Condition 2.6)

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

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

Permit Condition 2.7 - Visible Emissions

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

[IDAPA 58.01.01.625, 4/5/00]

MRRR (Permit Condition 2.8 through 2.9)

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

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

Permit Conditions 2.10 through 2.12 - Excess Emissions

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

MRRR (Permit Conditions 2.13 and 2.14)

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

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory;

- Notify DEQ of each excess emissions events as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ;
- Maintain records of each excess emissions event.

Permit Condition 2.15 - Sulfur Content Limits

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

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

[IDAPA 58.01.01.725, 3/29/10]

MRRR - (Permit Condition 2.16)

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

[IDAPA 58.01.01.322.06, 5/1/94]

Permit Condition 2.17 - Open Burning

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-622.

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

MRRR

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

Permit Condition 2.18 - Asbestos

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

[40 CFR 61, Subpart M]

MRRR

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

Permit Condition 2.19 - Accidental Release Prevention

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

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

[40 CFR 68.10 (a)]

MRRR

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

Permit Condition 2.20 - Recycling and Emissions Reductions

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

[40 CFR 82, Subpart F]

MRRR

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

Permit Condition 2.21 - NSPS General Provisions

This facility is subject to NSPS Subpart Dc, and is therefore required to comply with applicable General Provisions. The general provisions of 40 CFR 60, Subpart A are only applicable when there is an emissions unit that is subject to one of the other subparts of 40 CFR 60.

[40 CFR 60, Subpart A]

MRRR

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

Permit Condition 2.22 - NESHAP General Provisions

This facility is subject to NESHAP Subpart JJJJJ, and is therefore required to comply with applicable General Provisions. The general provisions of 40 CFR 63, Subpart A are only applicable when there is an emissions unit that is subject to one of the other subparts of 40 CFR 63, and the applicability of the general provisions will be as set forth in those other portions of 40 CFR 63.

[40 CFR 63, Subpart A]

MRRR

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

Permit Condition 2.23 - Monitoring and Recordkeeping

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

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

MRRR

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

Permit Conditions 2.24 through 2.27 - Performance Testing

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

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

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

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

MRRR (Permit Conditions 2.28)

The permittee shall submit report(s) for required compliance tests to DEQ following testing.

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

Permit Condition 2.28 - Reports and Certifications

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

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

MRRR

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

Permit Condition 2.29 - Incorporation of Federal Requirements by Reference

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

[IDAPA 58.01.01.107, 4/7/11]

MRRR

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

5.2 Emissions Unit-Specific Emissions Limits and MRRR

Kipper Boiler

Permit Condition 3.1- PM₁₀ Emissions Limits

Emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) from the Kipper boiler stack shall not exceed 16.3 pounds per hour (24-hour average) and 71.2 tons per any consecutive 12-month period.

MRRR - (Permit Conditions 3.8, 3.15, 3.17-20, 3.22, 3.25, 3.27)

Permit Condition 3.8-Operations Manual – Fuel Monitoring

Prior to combusting coal in the Kipper boiler, the permittee shall have developed a fuel monitoring operations manual for measuring the total tons of coal fed to the boiler on a daily basis. At a minimum the manual shall include a description of the equipment and the procedures/methods that will be used to measure the amount of coal fed to the boiler. A copy of the initial fuel monitoring operations manual, and any subsequent revisions, shall be maintained onsite and a copy shall be submitted to DEQ.

Permit Condition 3.15-Steam and Coal Monitoring

- 3.15.1 The steam produced in the Kipper boiler shall be monitored and recorded at least once per hour in units of pounds of steam per hour and average pounds of steam per hour per rolling 24-hour period.
- 3.15.2 The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a daily basis in units of tons per day. The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a monthly basis in units of tons per month and tons per rolling 12-month period.
- 3.15.3 The amount of heat input from coal shall be determined by multiplying the weight of coal fed to the boiler by 19 MMBtu/ton (9,500 Btu/lb).
- 3.15.4 The total amount of heat input to the Kipper boiler while burning wood only shall be determined by multiplying the hourly steam production rate (lbs steam per hour) by the steam heat content (1,000 Btu/lb) and the boiler efficiency (0.725) to determine the heat input required to produce that amount of steam.
- 3.15.5 Prior to combusting coal in the Kipper Boiler, the permittee shall have developed an efficiency factor for the type and source of coal to be combusted. The efficiency factor shall be submitted to DEQ for review and approval prior to combusting coal.
- 3.15.6 When coal is co-fired with wood, boiler efficiency shall be determined on a pro-rata basis based on the proportions of wood and coal fired.
- 3.15.7 The amount of heat input from wood shall be determined by subtracting the amount of heat input from coal (Btu/hr) from the total amount of heat input to the boiler (Btu/hr).

Permit Condition 3.17-40 CFR 64.6 – Approved CAM Monitoring

The permittee shall assure compliance with the particulate matter permit limits and standards for the Kipper boiler by conducting the approved monitoring and recordkeeping listed in Table 3.3.

Table 3.3 Compliance Assurance Monitoring Requirements for the Kipper Boiler

I. Indicator	Indicator No.1	Indicator No.2	Indicator No.3	Indicator No.4	Indicator No. 5
	Boiler Steaming Rate	Multiclone pressure drop	Scrubber downstream static pressure	Scrubber water pressure	Combination of firebox static pressure and induced draft fan speed setting
Measurement Approach	The boiler steaming rate is measured using a pressure and temperature compensated orifice plate that is located in the steam header. Data acquisition system monitors pressure drop across the plate, steam temperature, and steam pressure and calculates steam rate from these parameters.	The multiclone pressure drop is measured by digital pressure gauges located upstream and downstream of the multiclones. Pressure drop is determined by the difference in reading between the gauges and is displayed in the boiler control room.	The scrubber downstream static pressure is measured using a digital pressure gauge in the scrubber throat downstream of the scrubber rods.	The scrubber water pressure is measured using a manual pressure gauge located in the scrubber water supply header. Scrubber water pressure is determined by direct observation of the gauge.	The firebox static pressure is measured using a digital pressure gauge tapped into the firebox. The induced draft fan speed setting is measured directly from the speed control setting for the fan.
II. Indicator Range	An excursion is defined as a boiler steaming rate less than 35,000 lbs/hr or greater than 65,000 lbs/hr on a 24-hour rolling average.	An excursion is defined as a multiclone pressure drop less than 1.0 inches of water or greater than 6.0 inches of water.	An excursion is defined as a scrubber downstream static pressure that is less than 5.6 inches of water column.	An excursion is defined as a scrubber water pressure less than 4.0 psig or greater than 10 psig.	An excursion is defined as any time the induced draft fan goes to 100% speed and is unable to maintain a negative pressure in the firebox.
III. Performance Criteria					
A. Data Representativeness	The boiler steaming rate sensor is located in the steam header.	The multiclone pressure drop monitors are located upstream and downstream of the multiclones. The sensitivity is ± 0.1 in. H ₂ O.	The scrubber downstream static pressure monitor is located downstream of the scrubber rods. The sensitivity is ± 0.1 in. H ₂ O.	The scrubber water pressure monitor is located in the water supply header. The gauge can be read to ± 0.5 psig.	The firebox static pressure monitor is tapped into the firebox. The sensitivity is 0.01 inches of water column. The fan speed is recorded directly from the boiler control system and is recorded to the nearest 0.1 %.
B. Verification of Operational Status	n/a	n/a	n/a	n/a	n/a
C. QA/QC Practices and Criteria	The steam recorder was calibrated when installed. The orifice plate will be inspected every other year for physical condition and the permittee will check the overall health of the transmitter system by conducting span checks.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. ² The performance of the transmitters will be checked every other year and will include conducting span checks of the entire loop.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. ² The performance of the transmitter will be checked every other year and will include conducting span checks of the entire loop.	The pressure gauge reading will be compared with a second manual pressure gauge monthly. If readings differ by more than 1 psig, troubleshooting will be initiated.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. The performance of the transmitters will be checked every other year and will include conducting span checks of the entire loop. The induced draft fan speed setting does not require a calibration.
D. Monitoring Frequency	The boiler steam production is totalized continuously and recorded hourly.	Recorded every 2 hours.	Recorded every 2 hours.	Recorded every 2 hours.	Recorded every two hours.
Data Collection Procedures	Data acquisition system records hourly total.	Manually recorded in the boiler operating log.	Manually recorded in the boiler operating log.	Manually recorded in the boiler operating log.	Manually recorded in the boiler log.
Averaging period ¹	1-hour average steaming rate.	Not to be exceeded at any time	Not to be exceeded at any time	Not to be exceeded at any time	Not to be exceeded at any time.

¹The operating parameters are not to be deviated from at any time under normal operation. Periods of startup and shutdown are excluded.
²The statement regarding stability of digital pressure monitors was provided by the permittee in December 7, 2007, Compliance Assurance Monitoring sign letter.

Permit Condition 3.18-CFR 64.7 - Operation of Approved Monitoring

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

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

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

(d) In accordance with 40 CFR 64.7(d), upon detecting an excursion or exceedance, the permittee shall restore operation of the emissions unit(s) (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

Permit Condition 3.19-CFR 64 Excursion

In accordance with 40 CFR 64.6(c)(2), an excursion shall be defined as any measured emission of PM₁₀ which exceeds any corresponding emissions limit specified for the Boiler.

Permit Condition 3.20-CFR 64 Failure to Comply with Emission Limitation or Standard

In accordance with 40 CFR 64.7(e), if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this operating permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

Permit Condition 3.22-40 CFR 64.7 Documentation of need for improved monitoring.

In accordance with 40 CFR 64.7(e), after approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit (i.e., Tier I OP) to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

Permit Condition 3.25- PM Performance Tests

No later than April 3, 2017, the permittee shall conduct a performance test to measure PM and PM₁₀ emissions from the Kipper boiler stack to demonstrate compliance with the PM emissions standard in the

Fuel Burning Equipment – PM (permit condition 4.3) and the PM₁₀ emissions limit in the PM₁₀ Emissions Limits.

In addition, within 60 days of commencing the firing of coal as part of a wood-coal mixture, the permittee shall conduct a performance test to measure PM and PM₁₀ emissions from the Kipper boiler stack to demonstrate compliance with the PM emissions standard in the Fuel Burning Equipment – PM (permit condition 4.3) and the PM₁₀ emissions limit in the PM₁₀ Emissions Limits (permit condition 4.1).

The tests shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5 for PM emissions and Methods 5 and 202 for PM₁₀ emissions. Method 5 may be substituted for Method 201A. Alternatives to these test methods may also be used if use of the alternate test methods is reviewed and approved by DEQ in accordance with the Performance Testing General Condition. The initial performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The boiler steaming rate;
- The static air pressure and water pressure at the wet Ventri-Rod® scrubber;
- The pressure drop across the multiclone;

The quantity of coal and the quantity of wood in the fuel mixture shall be reported separately, either by weight (in units of tons/hr) or by gross heat content (in units of MMBtu/hr and Btu/lb). The methods used to make these determinations shall be described.

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 and recorded using the methods specified in IDAPA 58.01.01.625. In addition to correcting the Method 5 test results to 8% oxygen, the Method 5 results shall be corrected for altitude as required by IDAPA 58.01.01.680 to demonstrate compliance with the fuel burning equipment particulate matter standard.

After the initial performance test, future testing shall be performed according to the following schedule. If the PM emission rate measured in the most recent test is less than or equal to 75% of the emission standard in the Fuel Burning Equipment – PM (permit condition 4.3), the next test shall be conducted within five years of the test date. If the PM emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the emission standard in the Fuel Burning Equipment – PM (permit condition 4.3), the next test shall be conducted within two years of the test date. If the PM emission rate measured during the most recent performance test is greater than 90% of the emission standard in the Fuel Burning Equipment – PM (permit condition 4.3), the next test shall be conducted within one year of the test date.

Permit Condition 3.27-40 CFR 64.9 -Reporting and Recordkeeping Requirements

(a) *General reporting requirements.* (1) On and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part (i.e., 40 CFR 64) the owner or operator shall submit monitoring reports to the permitting authority in accordance with 40 CFR 70.6(a)(3)(iii) (see General Provision 24).

(2) A report for monitoring under this part (i.e., 40 CFR 64) shall include, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the following information, as applicable:

- (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (iii) (Not applicable until a Quality Improvement Plan is required.)

(b) *General recordkeeping requirements.* (1) The owner or operator shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

Permit Condition 3.2 - SO₂ Emissions Limits

Emissions of sulfur dioxide (SO₂) from the Kipper boiler stack shall not exceed 214 tons per any consecutive 12-month period.

MRRR - (Permit Conditions 3.8, 3.15, 3.16)

Permit Condition 3.8 - Operations Manual – Fuel Monitoring

Prior to combusting coal in the Kipper boiler, the permittee shall have developed a fuel monitoring operations manual for measuring the total tons of coal fed to the boiler on a daily basis. At a minimum the manual shall include a description of the equipment and the procedures/methods that will be used to measure the amount of coal fed to the boiler. A copy of the initial fuel monitoring operations manual, and any subsequent revisions, shall be maintained onsite and a copy shall be submitted to DEQ.

Permit Condition 3.15- Steam and Coal Monitoring

- 3.15.1 The steam produced in the Kipper boiler shall be monitored and recorded at least once per hour in units of pounds of steam per hour and average pounds of steam per hour per rolling 24-hour period.
- 3.15.2 The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a daily basis in units of tons per day. The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a monthly basis in units of tons per month and tons per rolling 12-month period.
- 3.15.3 The amount of heat input from coal shall be determined by multiplying the weight of coal fed to the boiler by 19 MMBtu/ton (9,500 Btu/lb).
- 3.15.4 The total amount of heat input to the Kipper boiler while burning wood only shall be determined by multiplying the hourly steam production rate (lbs steam per hour) by the steam heat content (1,000 Btu/lb) and the boiler efficiency (0.725) to determine the heat input required to produce that amount of steam.
- 3.15.5 Prior to combusting coal in the Kipper Boiler, the permittee shall have developed an efficiency factor for the type and source of coal to be combusted. The efficiency factor shall be submitted to DEQ for review and approval prior to combusting coal.
- 3.15.6 When coal is co-fired with wood, boiler efficiency shall be determined on a pro-rata basis based on the proportions of wood and coal fired.
- 3.15.7 The amount of heat input from wood shall be determined by subtracting the amount of heat input from coal (Btu/hr) from the total amount of heat input to the boiler (Btu/hr).

Permit Condition 3.16 - Fuel Receipts

For each shipment of coal received, the permittee shall obtain and maintain records of the following information that specifies the sulfur content by weight of the shipment received:

- Fuel receipts from the fuel supplier; or

- Representative samples and laboratory analysis documentation.

Permit Condition 3.3 - Fuel Burning Equipment – PM

3.3.1 Particulate matter emissions from the Kipper boiler shall not exceed 0.080 gr/dscf corrected to 8% oxygen when burning wood fuel.

3.3.2 Particulate matter emissions from the Kipper boiler shall not exceed 0.050 gr/dscf corrected to 8% oxygen when burning coal.

3.3.3 When two or more types of fuel are burned concurrently, the allowable emissions shall be determined by proportioning the gross heat input and emissions standards for each fuel. The proportional heat input shall be determined in accordance with the Steam and Coal Monitoring (permit condition 3.10).

MRRR - (Permit Conditions 3.15, 3.17-3.20, 3.22, 3.25, 3.27)

Permit Condition 3.15-Steam and Coal Monitoring

3.15.1 The steam produced in the Kipper boiler shall be monitored and recorded at least once per hour in units of pounds of steam per hour and average pounds of steam per hour per rolling 24-hour period.

3.15.2 The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a daily basis in units of tons per day. The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a monthly basis in units of tons per month and tons per rolling 12-month period.

3.15.3 The amount of heat input from coal shall be determined by multiplying the weight of coal fed to the boiler by 19 MMBtu/ton (9,500 Btu/lb).

3.15.4 The total amount of heat input to the Kipper boiler while burning wood only shall be determined by multiplying the hourly steam production rate (lbs steam per hour) by the steam heat content (1,000 Btu/lb) and the boiler efficiency (0.725) to determine the heat input required to produce that amount of steam.

3.15.5 Prior to combusting coal in the Kipper Boiler, the permittee shall have developed an efficiency factor for the type and source of coal to be combusted. The efficiency factor shall be submitted to DEQ for review and approval prior to combusting coal.

3.15.6 When coal is co-fired with wood, boiler efficiency shall be determined on a pro-rata basis based on the proportions of wood and coal fired.

3.15.7 The amount of heat input from wood shall be determined by subtracting the amount of heat input from coal (Btu/hr) from the total amount of heat input to the boiler (Btu/hr).

Permit Condition 3.17-40 CFR 64.6 – Approved CAM Monitoring

The permittee shall assure compliance with the particulate matter permit limits and standards for the Kipper boiler by conducting the approved monitoring and recordkeeping listed in Table 3.3.

Table 3.3 Compliance Assurance Monitoring Requirements for the Kipper Boiler

I. Indicator	Indicator No.1	Indicator No.2	Indicator No.3	Indicator No.4	Indicator No. 5
	Boiler Steaming Rate	Multiclone pressure drop	Scrubber downstream static pressure	Scrubber water pressure	Combination of firebox static pressure and induced draft fan speed setting
Measurement Approach	The boiler steaming rate is measured using a pressure and temperature compensated orifice plate that is located in the steam header. Data acquisition system monitors pressure drop across the plate, steam temperature, and steam pressure and calculates steam rate from these parameters.	The multiclone pressure drop is measured by digital pressure gauges located upstream and downstream of the multiclones. Pressure drop is determined by the difference in reading between the gauges and is displayed in the boiler control room.	The scrubber downstream static pressure is measured using a digital pressure gauge in the scrubber throat downstream of the scrubber rods.	The scrubber water pressure is measured using a manual pressure gauge located in the scrubber water supply header. Scrubber water pressure is determined by direct observation of the gauge.	The firebox static pressure is measured using a digital pressure gauge tapped into the firebox. The induced draft fan speed setting is measured directly from the speed control setting for the fan.
II. Indicator Range	An excursion is defined as a boiler steaming rate less than 35,000 lbs/hr or greater than 65,000 lbs/hr on a 24-hour rolling average.	An excursion is defined as a multiclone pressure drop less than 1.0 inches of water or greater than 6.0 inches of water.	An excursion is defined as a scrubber downstream static pressure that is less than 5.6 inches of water column.	An excursion is defined as a scrubber water pressure less than 4.0 psig or greater than 10 psig.	An excursion is defined as any time the induced draft fan goes to 100% speed and is unable to maintain a negative pressure in the firebox.
III. Performance Criteria					
A. Data Representativeness	The boiler steaming rate sensor is located in the steam header.	The multiclone pressure drop monitors are located upstream and downstream of the multiclones. The sensitivity is ± 0.1 in. H ₂ O.	The scrubber downstream static pressure monitor is located downstream of the scrubber rods. The sensitivity is ± 0.1 in. H ₂ O.	The scrubber water pressure monitor is located in the water supply header. The gauge can be read to ± 0.5 psig.	The firebox static pressure monitor is tapped into the firebox. The sensitivity is 0.01 inches of water column. The fan speed is recorded directly from the boiler control system and is recorded to the nearest 0.1 %.
B. Verification of Operational Status	n/a	n/a	n/a	n/a	n/a
C. QA/QC Practices and Criteria	The steam recorder was calibrated when installed. The orifice plate will be inspected every other year for physical condition and the permittee will check the overall health of the transmitter system by conducting span checks.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. ² The performance of the transmitters will be checked every other year and will include conducting span checks of the entire loop.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. ² The performance of the transmitter will be checked every other year and will include conducting span checks of the entire loop.	The pressure gauge reading will be compared with a second manual pressure gauge monthly. If readings differ by more than 1 psig, troubleshooting will be initiated.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. The performance of the transmitters will be checked every other year and will include conducting span checks of the entire loop. The induced draft fan speed setting does not require a calibration.
D. Monitoring Frequency	The boiler steam production is totalized continuously and recorded hourly.	Recorded every 2 hours.	Recorded every 2 hours.	Recorded every 2 hours.	Recorded every two hours.
Data Collection Procedures	Data acquisition system records hourly total.	Manually recorded in the boiler operating log.	Manually recorded in the boiler operating log.	Manually recorded in the boiler operating log.	Manually recorded in the boiler log.
Averaging period ¹	1-hour average steaming rate.	Not to be exceeded at any time	Not to be exceeded at any time	Not to be exceeded at any time	Not to be exceeded at any time.

¹The operating parameters are not to be deviated from at any time under normal operation. Periods of startup and shutdown are excluded.

²The statement regarding stability of digital pressure monitors was provided by the permittee in December 7, 2007, Compliance Assurance Monitoring sign letter.

Permit Condition 3.18-CFR 64.7 - Operation of Approved Monitoring

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

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

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

(d) In accordance with 40 CFR 64.7(d), upon detecting an excursion or exceedance, the permittee shall restore operation of the emissions unit(s) (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

Permit Condition 3.19-CFR 64 Excursion

In accordance with 40 CFR 64.6(c)(2), an excursion shall be defined as any measured emission of PM₁₀ which exceeds any corresponding emissions limit specified for the Boiler.

Permit Condition 3.20-CFR 64 Failure to Comply with Emission Limitation or Standard

In accordance with 40 CFR 64.7(e), if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this operating permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

Permit Condition 3.22-40 CFR 64.7 Documentation of need for improved monitoring.

In accordance with 40 CFR 64.7(e), after approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit (i.e., Tier I OP) to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

Permit Condition 3.25- PM Performance Tests

No later than April 3, 2017, the permittee shall conduct a performance test to measure PM and PM₁₀ emissions from the Kipper boiler stack to demonstrate compliance with the PM emissions standard in the

Fuel Burning Equipment – PM (permit condition 4.3) and the PM₁₀ emissions limit in the PM₁₀ Emissions Limits.

In addition, within 60 days of commencing the firing of coal as part of a wood-coal mixture, the permittee shall conduct a performance test to measure PM and PM₁₀ emissions from the Kipper boiler stack to demonstrate compliance with the PM emissions standard in the Fuel Burning Equipment – PM (permit condition 4.3) and the PM₁₀ emissions limit in the PM₁₀ Emissions Limits (permit condition 4.1).

The tests shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5 for PM emissions and Methods 5 and 202 for PM₁₀ emissions. Method 5 may be substituted for Method 201A. Alternatives to these test methods may also be used if use of the alternate test methods is reviewed and approved by DEQ in accordance with the Performance Testing General Condition. The initial performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The boiler steaming rate;
- The static air pressure and water pressure at the wet Ventri-Rod® scrubber;
- The pressure drop across the multiclone;

The quantity of coal and the quantity of wood in the fuel mixture shall be reported separately, either by weight (in units of tons/hr) or by gross heat content (in units of MMBtu/hr and Btu/lb). The methods used to make these determinations shall be described.

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 and recorded using the methods specified in IDAPA 58.01.01.625. In addition to correcting the Method 5 test results to 8% oxygen, the Method 5 results shall be corrected for altitude as required by IDAPA 58.01.01.680 to demonstrate compliance with the fuel burning equipment particulate matter standard.

After the initial performance test, future testing shall be performed according to the following schedule. If the PM emission rate measured in the most recent test is less than or equal to 75% of the emission standard in the Fuel Burning Equipment – PM (permit condition 4.3), the next test shall be conducted within five years of the test date. If the PM emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the emission standard in the Fuel Burning Equipment – PM (permit condition 4.3), the next test shall be conducted within two years of the test date. If the PM emission rate measured during the most recent performance test is greater than 90% of the emission standard in the Fuel Burning Equipment – PM (permit condition 4.3), the next test shall be conducted within one year of the test date.

Permit Condition 3.27-40 CFR 64.9 -Reporting and Recordkeeping Requirements

- (a) *General reporting requirements.* (1) On and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part (i.e., 40 CFR 64) the owner or operator shall submit monitoring reports to the permitting authority in accordance with 40 CFR 70.6(a)(3)(iii) (see General Provision 24).
- (2) A report for monitoring under this part (i.e., 40 CFR 64) shall include, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the following information, as applicable:
- (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
 - (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
 - (iii) (Not applicable until a Quality Improvement Plan is required.)

(b) *General recordkeeping requirements.* (1) The owner or operator shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

Permit Condition 3.4-Kipper Boiler Fuel Types

The permittee may combust only wood or a wood-coal mixture in the Kipper boiler. The Kipper boiler may be fired using coal up to 50% of the heat input on a 24-hour average.

MRRR - (Permit Condition 3.8, 3.15, 3.26)

Permit Condition 3.8-Operations Manual – Fuel Monitoring

Prior to combusting coal in the Kipper boiler, the permittee shall have developed a fuel monitoring operations manual for measuring the total tons of coal fed to the boiler on a daily basis. At a minimum the manual shall include a description of the equipment and the procedures/methods that will be used to measure the amount of coal fed to the boiler. A copy of the initial fuel monitoring operations manual, and any subsequent revisions, shall be maintained onsite and a copy shall be submitted to DEQ.

Permit Condition 3.15-Steam and Coal Monitoring

- 3.15.1 The steam produced in the Kipper boiler shall be monitored and recorded at least once per hour in units of pounds of steam per hour and average pounds of steam per hour per rolling 24-hour period.
- 3.15.2 The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a daily basis in units of tons per day. The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a monthly basis in units of tons per month and tons per rolling 12-month period.
- 3.15.3 The amount of heat input from coal shall be determined by multiplying the weight of coal fed to the boiler by 19 MMBtu/ton (9,500 Btu/lb).
- 3.15.4 The total amount of heat input to the Kipper boiler while burning wood only shall be determined by multiplying the hourly steam production rate (lbs steam per hour) by the steam heat content (1,000 Btu/lb) and the boiler efficiency (0.725) to determine the heat input required to produce that amount of steam.
- 3.15.5 Prior to combusting coal in the Kipper Boiler, the permittee shall have developed an efficiency factor for the type and source of coal to be combusted. The efficiency factor shall be submitted to DEQ for review and approval prior to combusting coal.
- 3.15.6 When coal is co-fired with wood, boiler efficiency shall be determined on a pro-rata basis based on the proportions of wood and coal fired.
- 3.15.7 The amount of heat input from wood shall be determined by subtracting the amount of heat input from coal (Btu/hr) from the total amount of heat input to the boiler (Btu/hr).

Permit Condition 3.26- Coal Combustion

The permittee shall notify DEQ in writing of the following event within 5 working days after occurrence:

- Date of commencement of firing a wood-coal mixture in the Kipper boiler.

Permit Condition 3.5-Coal Requirements

- 3.5.1 The sulfur content of the coal used in the Kipper boiler shall not exceed 1.0 % by weight.
- 3.5.2 The total quantity of coal combusted in the Kipper boiler shall not exceed 57 tons per day and 12,228 tons per any consecutive 12-calendar month period.

MRRR - (Permit Condition 3.8, 3.15, 3.16, 3.26)

Permit Condition 3.8 - Operations Manual – Fuel Monitoring

Prior to combusting coal in the Kipper boiler, the permittee shall have developed a fuel monitoring operations manual for measuring the total tons of coal fed to the boiler on a daily basis. At a minimum the manual shall include a description of the equipment and the procedures/methods that will be used to measure the amount of coal fed to the boiler. A copy of the initial fuel monitoring operations manual, and any subsequent revisions, shall be maintained onsite and a copy shall be submitted to DEQ.

Permit Condition 3.15-Steam and Coal Monitoring

- 3.15.1 The steam produced in the Kipper boiler shall be monitored and recorded at least once per hour in units of pounds of steam per hour and average pounds of steam per hour per rolling 24-hour period.
- 3.15.2 The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a daily basis in units of tons per day. The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a monthly basis in units of tons per month and tons per rolling 12-month period.
- 3.15.3 The amount of heat input from coal shall be determined by multiplying the weight of coal fed to the boiler by 19 MMBtu/ton (9,500 Btu/lb).
- 3.15.4 The total amount of heat input to the Kipper boiler while burning wood only shall be determined by multiplying the hourly steam production rate (lbs steam per hour) by the steam heat content (1,000 Btu/lb) and the boiler efficiency (0.725) to determine the heat input required to produce that amount of steam.
- 3.15.5 Prior to combusting coal in the Kipper Boiler, the permittee shall have developed an efficiency factor for the type and source of coal to be combusted. The efficiency factor shall be submitted to DEQ for review and approval prior to combusting coal.
- 3.15.6 When coal is co-fired with wood, boiler efficiency shall be determined on a pro-rata basis based on the proportions of wood and coal fired.
- 3.15.7 The amount of heat input from wood shall be determined by subtracting the amount of heat input from coal (Btu/hr) from the total amount of heat input to the boiler (Btu/hr).

Permit Condition 3.16 - Fuel Receipts

For each shipment of coal received, the permittee shall obtain and maintain records of the following information that specifies the sulfur content by weight of the shipment received:

- Fuel receipts from the fuel supplier; or
- Representative samples and laboratory analysis documentation.

Permit Condition 3.26- Coal Combustion

The permittee shall notify DEQ in writing of the following event within 5 working days after occurrence:

- Date of commencement of firing a wood-coal mixture in the Kipper boiler.

Permit Condition 3.6-40 CFR 64.6 Steam Production

The Kipper boiler steam production rate shall not exceed 65,000 pounds of steam per hour on a 24-hour rolling average.

MRRR - (Permit Condition 3.15)

Permit Condition 3.15-Steam and Coal Monitoring

- 3.15.1 The steam produced in the Kipper boiler shall be monitored and recorded at least once per hour in units of pounds of steam per hour and average pounds of steam per hour per rolling 24-hour period.
- 3.15.2 The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a daily basis in units of tons per day. The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a monthly basis in units of tons per month and tons per rolling 12-month period.
- 3.15.3 The amount of heat input from coal shall be determined by multiplying the weight of coal fed to the boiler by 19 MMBtu/ton (9,500 Btu/lb).
- 3.15.4 The total amount of heat input to the Kipper boiler while burning wood only shall be determined by multiplying the hourly steam production rate (lbs steam per hour) by the steam heat content (1,000 Btu/lb) and the boiler efficiency (0.725) to determine the heat input required to produce that amount of steam.
- 3.15.5 Prior to combusting coal in the Kipper Boiler, the permittee shall have developed an efficiency factor for the type and source of coal to be combusted. The efficiency factor shall be submitted to DEQ for review and approval prior to combusting coal.
- 3.15.6 When coal is co-fired with wood, boiler efficiency shall be determined on a pro-rata basis based on the proportions of wood and coal fired.
- 3.15.7 The amount of heat input from wood shall be determined by subtracting the amount of heat input from coal (Btu/hr) from the total amount of heat input to the boiler (Btu/hr).

Permit Condition 3.7 Ventri-Rod® Scrubber and Multiclone

The permittee shall install, maintain, and operate a multiclone and a wet scrubber on the Kipper boiler to control the emissions of PM and PM₁₀.

MRRR - (Permit Condition 3.9)

Permit Condition 3.9- Boiler, Ventri-Rod Scrubber, and Multiclone Annual Inspection and Maintenance

At least once per calendar year, the permittee shall inspect the internal workings of the Kipper boiler and perform any maintenance required to maintain efficient combustion. The permittee shall also inspect the Ventri-rod scrubber and multiclone and perform any maintenance required. The permittee shall maintain records of the boiler, Ventri-rod scrubber, and multiclone maintenance conducted to comply with this permit condition. The records shall provide the date the inspection was conducted and a description of the maintenance performed on the boiler to maintain combustion efficiency.

Permit Condition 3.10-40 CFR 63 Subpart JJJJJJ Tune-Up Requirement

In accordance with 40 CFR 63.11223(b), the facility must conduct a performance tune-up of the Kipper boiler according to this permit condition and keep records as required in the records maintenance permit condition in this section. The facility must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.

The permittee must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in this permit condition. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

- (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the facility may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the facility may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- (4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- (5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- (6) Maintain on-site and submit, if requested by the Administrator, a report containing the information as follows:
 - (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
 - (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
 - (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- (7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

MRRR - (Permit Condition 3.23, 3.28, 3.31)

Permit Condition 3.23-40 CFR 63 Subpart JJJJJJ 11225(a) Records Maintenance

In accordance with 40 CFR 63.11225(a), for the Kipper boiler, the permittee must maintain the records specified in this permit condition.

- (1) The permittee must submit all of the notifications in 40 CFR 63.7(b); 63.8(e) and (f); 63.9(b) through (e), (g), and (h) that apply to the permittee by the dates specified in those sections except as specified in paragraphs (2) and (3) of this permit condition.
- (2) An Initial Notification must be submitted no later than January 20, 2014.
- (3) The permittee must submit the Notification of Compliance Status no later than July 19, 2014. The Notification of Compliance Status must include the information and certification(s) of compliance as follows, as applicable, and signed by a responsible official.

- (i) The permittee must submit the information required in 40 CFR 63.9(h)(2), except the information listed in 40 CFR 63.9(h)(2)(i)(B), (D), (E), and (F).
- (ii) "This facility complies with the requirements in 40 CFR 63.11214 to conduct an initial tune-up of the boiler."
- (iii) "This facility has had an energy assessment performed according to 40 CFR 63.11214(c)."
- (iv) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
- (v) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13.

Permit Condition 3.28-40 CFR 63 Subpart JJJJJJ Tune-Up Report

In accordance with 40 CFR 63.11214(b), the permittee must conduct a performance tune-up according to 40 CFR 63.11223(b) and the permittee must submit a signed statement in the Notification of Compliance Status report that indicates that the permittee conducted a tune-up of the boiler.

Permit Condition 3.31-40 CFR 64 Conflict Provision

Should there be a conflict between 40 CFR 64 and any of the permit conditions pertaining to 40 CFR 64 in this permit, then 40 CFR 64 shall govern.

Permit Condition 3.11-40 CFR 63 Subpart JJJJJJ One-Time Energy Assessment

In accordance with 40 CFR 63 Subpart JJJJJJ Table 2, the permittee must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items 1) to 4) appropriate for the on-site technical hours listed in §63.11237:

- (1) A visual inspection of the boiler system,
- (2) An evaluation of operating characteristics of the affected boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,
- (3) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator,
- (4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
- (5) A list of major energy conservation measures that are within the facility's control,
- (6) A list of the energy savings potential of the energy conservation measures identified, and
- (7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

MRRR - (Permit Conditions 3.12, 3.23, 3.29, 3.31)

Permit Condition 3.12-40 CFR 63 Subpart JJJJJJ One-Time Energy Assessment

(see text above)

Permit Condition 3.23-40 CFR 63 Subpart JJJJJ 11225(a) Records Maintenance

In accordance with 40 CFR 63.11225(a), for the Kipper boiler, the permittee must maintain the records specified in this permit condition.

- (1) The permittee must submit all of the notifications in 40 CFR 63.7(b); 63.8(e) and (f); 63.9(b) through (e), (g), and (h) that apply to the permittee by the dates specified in those sections except as specified in paragraphs (2) and (3) of this permit condition.
- (2) An Initial Notification must be submitted no later than January 20, 2014.
- (3) The permittee must submit the Notification of Compliance Status no later than July 19, 2014. The Notification of Compliance Status must include the information and certification(s) of compliance as follows, as applicable, and signed by a responsible official.
 - (i) The permittee must submit the information required in 40 CFR 63.9(h)(2), except the information listed in 40 CFR 63.9(h)(2)(i)(B), (D), (E), and (F).
 - (ii) "This facility complies with the requirements in 40 CFR 63.11214 to conduct an initial tune-up of the boiler."
 - (iii) "This facility has had an energy assessment performed according to 40 CFR 63.11214(c)."
 - (iv) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
 - (v) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13.

Permit Condition 3.29-40 CFR 63 Subpart JJJJJ Energy Assessment Report

In accordance with 40 CFR 63.11214(c), the facility must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to 40 CFR 63 Subpart JJJJJ Table 2 and is an accurate depiction of the permittee's facility.

Permit Condition 3.31-40 CFR 64 Conflict Provision

Should there be a conflict between 40 CFR 64 and any of the permit conditions pertaining to 40 CFR 64 in this permit, then 40 CFR 64 shall govern.

Permit Condition 3.12-40 CFR 63 Subpart JJJJJ Tune-Up Deadline

In accordance with 40 CFR 63.11196(a)(1), the facility must achieve compliance with the work practice or management standard tune-up of the Kipper boiler no later than March 21, 2014.

MRRR - (Permit Conditions 3.23, 3.28, 3.31)

Permit Condition 3.23-40 CFR 63 Subpart JJJJJJ 11225(a) Records Maintenance

In accordance with 40 CFR 63.11225(a), for the Kipper boiler, the permittee must maintain the records specified in this permit condition.

- (1) The permittee must submit all of the notifications in 40 CFR 63.7(b); 63.8(e) and (f); 63.9(b) through (e), (g), and (h) that apply to the permittee by the dates specified in those sections except as specified in paragraphs (2) and (3) of this permit condition.
- (2) An Initial Notification must be submitted no later than January 20, 2014.
- (3) The permittee must submit the Notification of Compliance Status no later than July 19, 2014. The Notification of Compliance Status must include the information and certification(s) of compliance as follows, as applicable, and signed by a responsible official.
 - (i) The permittee must submit the information required in 40 CFR 63.9(h)(2), except the information listed in 40 CFR 63.9(h)(2)(i)(B), (D), (E), and (F).
 - (ii) "This facility complies with the requirements in 40 CFR 63.11214 to conduct an initial tune-up of the boiler."
 - (iii) "This facility has had an energy assessment performed according to 40 CFR 63.11214(c)."
 - (iv) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
 - (v) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13.

Permit Condition 3.28-40 CFR 63 Subpart JJJJJJ Tune-Up Report

In accordance with 40 CFR 63.11214(b), the permittee must conduct a performance tune-up according to 40 CFR 63.11223(b) and the permittee must submit a signed statement in the Notification of Compliance Status report that indicates that the permittee conducted a tune-up of the boiler.

Permit Condition 3.31-40 CFR 64 Conflict Provision

Should there be a conflict between 40 CFR 64 and any of the permit conditions pertaining to 40 CFR 64 in this permit, then 40 CFR 64 shall govern.

Permit Condition 3.13-40 CFR 63 Subpart JJJJJJ One-Time Energy Assessment Deadline

In accordance with 40 CFR 63.11196(a)(3), the facility must achieve compliance with the energy assessment requirement no later than March 21, 2014.

MRRR - (Permit Conditions 3.23, 3.29, 3.31)

Permit Condition 3.23-40 CFR 63 Subpart JJJJJJ 11225(a) Records Maintenance

In accordance with 40 CFR 63.11225(a), for the Kipper boiler, the permittee must maintain the records specified in this permit condition.

- (1) The permittee must submit all of the notifications in 40 CFR 63.7(b); 63.8(e) and (f); 63.9(b) through (e), (g), and (h) that apply to the permittee by the dates specified in those sections except as specified in paragraphs (2) and (3) of this permit condition.
- (2) An Initial Notification must be submitted no later than January 20, 2014.
- (3) The permittee must submit the Notification of Compliance Status no later than July 19, 2014. The Notification of Compliance Status must include the information and certification(s) of compliance as follows, as applicable, and signed by a responsible official.
 - (i) The permittee must submit the information required in 40 CFR 63.9(h)(2), except the information listed in 40 CFR 63.9(h)(2)(i)(B), (D), (E), and (F).
 - (ii) "This facility complies with the requirements in 40 CFR 63.11214 to conduct an initial tune-up of the boiler."
 - (iii) "This facility has had an energy assessment performed according to 40 CFR 63.11214(c)."
 - (iv) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
 - (v) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in 40 CFR 63.13.

Permit Condition 3.29-40 CFR 63 Subpart JJJJJJ Energy Assessment Report

In accordance with 40 CFR 63.11214(c), the facility must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to 40 CFR 63 Subpart JJJJJJ Table 2 and is an accurate depiction of the permittee's facility.

Permit Condition 3.31-40 CFR 64 Conflict Provision

Should there be a conflict between 40 CFR 64 and any of the permit conditions pertaining to 40 CFR 64 in this permit, then 40 CFR 64 shall govern.

Permit Condition 3.14-40 CFR 63 Subpart JJJJJJ Fuel Requirement

Wood materials combusted in the Kipper Boiler shall be either "clean cellulosic biomass" (as defined in 40 CFR 241.2) or fuels produced from the processing of discarded non-hazardous secondary materials and that meet the legitimacy criteria specified in 40 CFR 241.3(d)(1). If wood materials that do not meet these requirements are combusted in the Kipper boiler, the permittee shall comply with applicable provisions for units combusting non-hazardous solid waste enacted in accordance with 40 CFR Subpart DDDD.

MRRR - (Permit Conditions 3.30 and 3.31)

Permit Condition 3.30-40 CFR 63 Subpart JJJJJJ Biennial Compliance Report

In accordance with 40 CFR 63.11225(b), the permittee must prepare a biennial or 5-year compliance report as specified in paragraphs (1) and (2) of this permit condition.

- (1) Company name and address.

- (2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. The permittee notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
- (i) "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."
- (ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
- (iii) "This facility complies with the requirement in 40 CFR 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

Permit Condition 3.31-40 CFR 64 Conflict Provision

Should there be a conflict between 40 CFR 64 and any of the permit conditions pertaining to 40 CFR 64 in this permit, then 40 CFR 64 shall govern.

Permit Condition 3.21-40 CFR 64 QIP

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

MRRR - (Permit Condition 3.22)

Permit Condition 3.22-40 CFR 64.7 Documentation of need for improved monitoring.

In accordance with 40 CFR 64.7(e), after approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit (i.e., Tier I OP) to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

Boilers 1 & 2

Permit Condition 4.1 - Fuel Burning Equipment – PM

Particulate matter emissions from Boiler 1 and Boiler 2 shall not exceed 0.015 gr/dscf corrected to 3% oxygen when burning natural gas.

MRRR - (Permit Condition 4.3)

Natural Gas Combustion Monitoring

The permittee shall install, calibrate, maintain, and operate equipment to measure the quantity of natural gas combusted in Boilers 1 and 2. The natural gas combustion data is used in the facility-wide CO emission calculation in Section 9 of this permit. The following quantities of natural gas combusted shall be monitored and recorded each calendar month in units of million standard cubic feet (MMscf) per month and MMscf per rolling 12-calendar month period:

- Total gas combusted at the Rexburg facility

- Total gas combusted by Boilers 1 and 2

Each rolling 12-calendar month calculation shall be the summation of the quantities of gas combusted in that calendar month and in each of the preceding 11 calendar months.

Process A

Permit Condition 5.1

Emissions of PM₁₀ from the drying process and material transfer system stacks shall not exceed any corresponding emissions rate limits listed in the following table.

Table 6.3 Dryer Process and Material Transfer System PM₁₀ Emissions Limits

Source Description	PM ₁₀ Emissions Limit (24-hr average)
Cooler/Dryer stack 7101	2.2 lb/hr
Cooler/Dryer stack 7102	2.2 lb/hr
Cooler/Dryer stack 7019	3.4 lb/hr

MRRR - (Permit Condition 5.5)

The permittee shall monitor and record, on a daily basis, the calendar date and the total product output of dried food products, in tons per day, from Process A. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day.

Process B

Permit Condition 6.1

Emissions of PM₁₀ from the drying process and material transfer system stacks shall not exceed any corresponding emissions rate limits listed in the following table.

Table 6.3 Dryer Process And Material Transfer System PM₁₀ Emissions Limits

Source Description	PM ₁₀ Emissions Limit (24-hr average)
For each of the following Cooler/Dryer 3-stack groups, the arithmetic average of the emission rates from the combined 3 stacks in the group shall not exceed the listed emission limit:	
Stack group 4000, 228, and 234	3.2 lb/hr
Stack group 311, 312, and 410/411	1.2 lb/hr
Stack group 613/614, 615/616, and 638	2.2 lb/hr

MRRR - (Permit Condition 6.5)

The permittee shall monitor and record, on a daily basis, the calendar date and the total product output of dried food products including additives, in tons per day, from Process B. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day.

Plant Space Heaters

Permit Condition 7.1

There are no emission limits specifically applicable to the plant space heaters. Emissions from plant space heaters are regulated as part of the facility-wide emissions in the Carbon Monoxide Emissions Limit and the Greenhouse Gas Emissions Limit.

Carbon Monoxide Emissions Limit

Permit Condition 8.1

The CO emissions from this facility shall not exceed 249 tons per year from aggregated emissions sources, calculated as a rolling 12-calendar month total.

MRRR - (Permit Condition 8.3)

For all combustion sources, the permittee shall calculate and record rolling 12-calendar month total CO emissions based on steam production and coal consumption for the boilers and natural gas consumption

for the process dryers and space heaters. The CO compliance demonstration shall use emission factors developed through performance testing for the Kipper boiler and process dryers. The permittee shall use AP-42 emissions factors for natural gas combustion to determine CO emissions for Boiler 1 and Boiler 2. Gas combusted in the plant space heaters shall be included with the process gas usage. Monthly calculations of actual emissions shall be used to determine rolling 12-month total emissions to demonstrate compliance with the annual emission limit in the Carbon Monoxide Emissions Limit (permit condition 8.1). Records of calculated CO emissions and the operating data and emission factors used to calculate emissions shall be maintained onsite for a period of at least five years and shall be made available to DEQ representatives upon request.

MRRR - (Permit Condition 8.4)

The permittee shall monitor and record on a monthly basis the CO emissions from this facility in tons per rolling 12-calendar month period. The quantity of CO emissions shall be determined using the following equation:

$$E_{CO} = EF_{KB} \times B_{SP} + [EF_P \times (G_T - G_B)] + (EF_B \times G_B)$$

- Where:
- E_{CO} = Facility CO emission rate in tons for the consecutive 12-month period
 - EF_{KB} = Emission factor for Kipper boiler CO. The permittee shall use 0.464 tons CO/million pounds of steam, or a DEQ-approved alternative factor approved in writing.
 - B_{SP} = Kipper boiler steam production in millions of pounds. Example - for 5,587,000 pounds of steam production in a rolling 12-month period, use 5.587.
 - EF_P = Emission factor for natural gas used in the process. That is, CO emission factor for all natural gas combustion units at the facility except the boilers. The permittee shall use 0.133 ton/MMscf of natural gas, or a DEQ-approved alternative factor approved in writing.
 - G_T = Total natural gas combusted at the Rexburg facility in the last 12-months; MMscf
 - G_B = Total natural gas combusted in the Boilers 1 and 2 in the last 12 months; MMscf
 - EF_B = Emission factor for natural gas used in Boilers 1 and 2. The permittee shall use 0.042 ton/MMscf, or a DEQ-approved alternative factor approved in writing.

After performance testing for CO emissions is conducted with coal firing per the CO Performance Test (permit condition 3.15), the Permittee shall revise this equation to include a term for CO emissions during coal combustion. The revised equation shall be submitted to DEQ for review and approval prior to being used to calculate CO emissions.

MRRR - (Permit Condition 8.7.1)

Once per annum, the permittee shall report to DEQ the rolling 12-calendar month total CO emissions recorded under the Carbon Monoxide Emissions Limit Compliance (permit condition 8.3) and the CO Emissions (permit condition 8.4). The report shall be for the period January 1st through December 31st and shall be due on or before March 1st of each calendar year. All reports must be certified in accordance with IDAPA 58.01.01.123.

Permit Condition 8.2

The Carbon Dioxide Equivalent (CO₂e) emissions from this facility shall not exceed 99,000 tons per year from aggregated emissions sources, calculated as a rolling 12-calendar month total.

MRRR - (Permit Condition 8.5)

For all combustion sources, the permittee shall calculate and record rolling 12-calendar month total CO₂e emissions based on the total coal, wood, and natural gas consumption by the facility. The CO₂e compliance demonstration shall use the emission factors and calculation methods developed from EPA's Mandatory Reporting Rule (40 CFR 98, Subpart C). Monthly calculations of actual emissions shall be used to determine rolling 12-calendar month total emissions to demonstrate compliance with the annual emission limit in the Greenhouse Gas Emissions Limit (permit condition 8.2). Records of calculated CO₂e emissions and the operating data and emission factors used to calculate emissions shall be maintained onsite for a period of at least five years and shall be made available to DEQ representatives upon request.

MRRR - (Permit Condition 8.6)

The permittee shall monitor and record on a monthly basis the CO₂e emissions from this facility in tons per rolling 12-calendar month period. The quantity of CO₂e emissions shall be determined using the following equation:

$$E_{CO_2e} = (WB_B \times HHV_W \times EF_W) + (G_{TB} \times EF_G)$$

Where: E_{CO_2e} = Facility CO₂e emission rate in tons for the consecutive 12-calendar month period.

WB_B = Boiler wood burned in tons of bone dry solids burned for the consecutive 12-month period

HHV_W = High Heat Value of wood; Expressed in millions of Btu per short ton of bone dry solids of wood burned. The permittee shall use 17.48 MMBtu/ton bone dry solids, or a DEQ-approved alternative factor approved in writing.

EF_W = Emission Factor for Wood Burned. The permittee shall use 1.056×10^{-1} tons/MMBtu, or a DEQ-approved alternative factor approved in writing.

G_{TB} = Natural gas combusted at the facility in MMBtu for the 12-month period.

EF_G = Emission Factor for natural gas burned. The permittee shall use 5.85×10^{-2} tons/MMBtu, or a DEQ-approved alternative factor approved in writing.

Prior to combusting coal, the Permittee shall revise this equation to include a term for CO₂e emissions during coal combustion. The revised equation shall be submitted to DEQ for review and approval prior to being used to calculate CO₂e emissions.

MRRR - (Permit Condition 8.7.2)

Once per annum, the permittee shall report to DEQ the rolling 12-month total CO₂e emissions recorded under the Greenhouse Gas Emissions Limit Compliance (permit condition 8.5) and the Greenhouse Gas Emissions (permit condition 8.6). The report shall be for the period January 1st through December 31st and shall be due on or before March 1st of each calendar year. All reports must be certified in accordance with IDAPA 58.01.01.123.

6. General Provisions

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

General Compliance, Duty to Comply

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

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

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

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

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

General Compliance, Duty to Supplement or Correct Application

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

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

Reopening, Additional Requirements, Material Mistakes, Etc.

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

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

Reopening, Permitting Actions

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

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

Property Rights

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

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

Information Requests

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

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

Information Requests, Confidential Business Information

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

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

Severability

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

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

Changes Requiring Permit Revision or Notice

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

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

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA

58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

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

Federal and State Enforceability

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

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

Inspection and Entry

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

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

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

New Applicable Requirements

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

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

Fees

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

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

Certification

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

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

Renewal

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

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

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

Permit Shield

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

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

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

Compliance Schedule and Progress Reports

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

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

Periodic Compliance Certification

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

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

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

False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports.

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

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

Reporting Deviations and Excess Emissions

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

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

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

Permit Revision Not Required, Emissions Trading

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

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

Emergency

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

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

7. REGULATORY REVIEW

7.1 Attainment Designation (40 CFR 81.313)

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

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

Post project facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for PM₁₀, SO₂, NO_x, and CO as demonstrated in the Emissions Inventories Section of this analysis. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10.

7.3 PSD Classification (40 CFR 52.21)

The facility is not classified as an existing major stationary source, because the estimated emissions of PM₁₀, SO₂, NO_x, and CO do not have the potential to exceed major stationary source thresholds and the facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a). The facility is not a major source for CO_{2e} because it is an existing source that has not exceeded the GHG major source threshold of 100,000 tpy, nor has it made a change that would increase GHG emissions by 75,000 tpy.

7.4 NSPS Applicability (40 CFR 60)

Because the facility has three boilers rated at greater than 10 MMBtu/hr (but less than 100 MMBtu/hr) the following NSPS requirement may apply to this facility:

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

As stated in the SOB for permit T2-030515, under 40 CFR 60.40b(a), the affected facilities to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr. All three of the Rexburg facility boilers meet the size criteria, but Boiler 1 and the Kipper boiler do not meet the date of construction criteria based on the information included in the permit applications and in the file for this facility. However, Boiler 2 was installed after June 9, 1989 and is therefore subject to Subpart Dc. Boiler 2 combusts only natural gas and is therefore subject only to the requirements of 60.48c(g)(2), which requires that the facility record and maintain records of the amount of each fuel combusted during each calendar month, or 60.48c(g)(3), which requires that the facility record the total amount of each steam generating unit fuel delivered to that property during each calendar month.

§ 60.40c Applicability and Delegation of Authority

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

(b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

(c) Steam generating units that meet the applicability requirements in paragraph (a) of this section are not subject to the sulfur dioxide (SO₂) or particulate matter (PM) emission limits, performance testing requirements, or monitoring requirements under this subpart (§§60.42c, 60.43c, 60.44c, 60.45c, 60.46c, or 60.47c) during periods of combustion research, as defined in §60.41c.

As discussed previously, the Murray boiler is a natural gas-fired boiler rated at between 10 MMBtu/hr and 100 MMBtu/hr and was constructed after June 9, 1989. Therefore, the Murray natural gas fired boilers is subject to some of the requirements of this subpart.

§ 60.41c Definitions

The definitions of this section apply to the Murray natural gas fired boiler at this facility.

§ 60.48c Reporting and recordkeeping requirements

Section (a) requires that the owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by §60.7 of this part. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

These requirements are assessed by Permit Condition 4.4.

Section (g)(1) requires that except as provided under paragraphs (g)(2) and (g)(3) of this section, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

Section (g)(2) allows as an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

Section (g)(3) allows as an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

These requirements are assessed by Permit Condition 4.5.

Section (i) requires that 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.

These requirements are assessed by Permit Condition 4.6.

7.5 NESHAP Applicability (40 CFR 61)

None of the regulations in this section apply to any sources at this facility.

7.6 MACT Applicability (40 CFR 63)

Subpart JJJJJ applies to the Kipper & Sons boiler.

The boiler was constructed in 1981, so is an existing boiler.

§ 63.11194 What is the affected source of this subpart?

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

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

The boiler is not currently firing on coal, so it doesn't meet the definition of an affected source for coal in accordance with the definition:

Coal subcategory includes any boiler that burns any solid fossil fuel and no more than 15 percent biomass on an annual heat input basis.

The boiler is capable of burning coal, but coal is not currently being used, and there are no immediate plans to use it, so Subpart 6J has not been evaluated for applicable requirements when burning coal. If in the future, coal will be used, then the requirements of Subpart 6J when burning coal need to be addressed. The following then applies (from EPA e-mail, January 26, 2013):

(break in section)

The facility will burn biomass, which is defined as follows per 40 CFR 63.11237:

Biomass means any biomass-based solid fuel that is not a solid waste. This includes, but is not limited to, wood residue and wood products (e.g., trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings, and shavings); animal manure, including litter and other bedding materials; vegetative agricultural and silvicultural materials, such as logging residues (slash), nut and grain hulls and chaff (e.g., almond, walnut, peanut, rice, and wheat), bagasse, orchard prunings, corn stalks, coffee bean hulls and grounds. This definition of biomass is not intended to suggest that these materials are or are not solid waste.

Solid Waste is defined in 40 CFR 241 as follows: *Solid waste means the term solid waste as defined in 40 CFR 258.2.*

40 CFR 258.2 defines solid waste as follows: *Solid waste means any garbage, or refuse, sludge from a wastewater treatment plant, water supply treatment plant, or air pollution control facility and other discarded material, including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining, and agricultural operations, and from community activities, but does not include solid or dissolved materials in domestic sewage, or solid or dissolved materials in irrigation return flows or industrial discharges that are point sources subject to permit under 33 U.S.C. 1342, or source, special nuclear, or by-product material as defined by the Atomic Energy Act of 1954, as amended (68 Stat. 923).*

The Kipper boiler will burn materials are chipped or hogged clean wood that is salvaged from construction debris sourced from landfills. Fuel suppliers process the construction debris by separating clean wood from the debris. This could meet the definition of solid waste. Subpart JJJJJJ does not apply to burning solid waste. The material has been determined to be non-hazardous secondary materials that are not solid waste as described later in this section.

40 CFR 63.11210(h) addresses the situation where a boiler becomes subject to a different subcategory:

(h) For affected boilers that switch fuels or make a physical change to the boiler that results in the applicability of a different subcategory within subpart JJJJJJ or the boiler becoming subject to subpart JJJJJJ, you must demonstrate compliance within 180 days of the effective date of the fuel switch or the physical change. Notification of such changes must be submitted according to §63.11225(g).

(break in section)

In accordance with 40 CFR 63.11196(a)(1), the facility must achieve compliance with the work practice or management standard tune-up no later than March 21, 2014.

In accordance with 40 CFR 63.11196(a)(3), the facility must achieve compliance with the energy assessment requirement no later than March 21, 2014.

(break in section)

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

(a) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution

control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

This applies.

(break in section)

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

(break in section)

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

(c) If you own or operate an existing affected boiler with a heat input capacity of 10 million Btu per hour or greater, you must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 to this subpart and is an accurate depiction of your facility.

The Notification of Compliance Status report is required by the general provisions.

(break in section)

Table 2 requires, for an existing biomass or oil boiler:

Conduct an initial tune-up as specified in § 63.11214, and conduct a tune-up of the boiler biennially as specified in § 63.11223.

Table 2 also requires, for existing coal, biomass, or oil (units with heat input capacity of 10 MMBtu/hr and greater):

Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. Energy assessor approval and qualification are used to meet the energy assessment requirements. A facility that operates under an energy management program compatible with ISO 50001 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items (1) to (4) appropriate for the on-site technical hours listed in §63.11237:

- (1) A visual inspection of the boiler system,*
- (2) An evaluation of operating characteristics of the affected boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,*
- (3) An inventory of major energy use systems consuming energy from affected boiler(s) and which are under control of the boiler owner or operator,*
- (4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,*
- (5) A list of major energy conservation measures that are within the facility's control,*
- (6) A list of the energy savings potential of the energy conservation measures identified, and*
- (7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.*

The boiler has a Btu rating of 90 MBtu/hr, which is greater than 10 MM Btu/hr, so this applies.

(break in section)

§63.11223 How do I demonstrate continuous compliance with the work practice and management practice standards?

(a) For affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a performance tune-up according to paragraph (b) of this section and keep records as required in §63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.

(b) Except as specified in paragraphs (c) through (f) of this section, you must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of this section. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler.

(1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.

(2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

(3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.

(4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.

(5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

(6) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of this section.

(i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.

(ii) A description of any corrective actions taken as a part of the tune-up of the boiler.

(iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

(7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

(c) Boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up must conduct a tune-up of the boiler every 5 years as specified in paragraphs (b)(1) through (7) of this section. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed boiler with an oxygen trim system, the first 5-year tune-up must be no later than 61 months after the initial startup. You may delay the burner inspection specified in paragraph (b)(1) of this section and inspection of the system controlling the air-to-

fuel ratio specified in paragraph (b)(3) of this section until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months.

(break in section)

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

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

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

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

(break in section)

(4) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in § 63.11196 (March 21, 2014 + 120 days = July 19, 2014) unless you must conduct a performance stack test. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official.

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

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

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

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

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

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

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

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

emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section.

(1) Company name and address.

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

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

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

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

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

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

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

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

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

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

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

40 CFR 63.11225 references 40 CFR 241:

40 CFR 241.3(a) Except as provided in paragraph (b) of this section or in § 241.4(a) of this subpart, non-hazardous secondary materials that are combusted are solid wastes, unless a petition is submitted to, and a determination granted by, the EPA pursuant to paragraph (c) of this section. The criteria to be

addressed in the petition, as well as the process for making the non-waste determination, are specified in paragraph (c) of this section.

(b) The following non-hazardous secondary materials are not solid wastes when combusted:

(1) Non-hazardous secondary materials used as a fuel in a combustion unit that remain within the control of the generator and that meet the legitimacy criteria specified in paragraph (d)(1) of this section.

The facility proposes to meet the criteria in(b)(1). The legitimacy criteria is as follows:

(break in section)

(d) Legitimacy criteria for non-hazardous secondary materials.

(1) Legitimacy criteria for non-hazardous secondary materials used as a fuel in combustion units include the following:

(i) The non-hazardous secondary material must be managed as a valuable commodity based on the following factors:

(A) The storage of the non-hazardous secondary material prior to use must not exceed reasonable time frames;

(B) Where there is an analogous fuel, the non-hazardous secondary material must be managed in a manner consistent with the analogous fuel or otherwise be adequately contained to prevent releases to the environment;

(C) If there is no analogous fuel, the non-hazardous secondary material must be adequately contained so as to prevent releases to the environment;

(ii) The non-hazardous secondary material must have a meaningful heating value and be used as a fuel in a combustion unit that recovers energy.

(iii) The non-hazardous secondary material must contain contaminants or groups of contaminants at levels comparable in concentration to or lower than those in traditional fuel(s) which the combustion unit is designed to burn. In determining which traditional fuel(s) a unit is designed to burn, persons may choose a traditional fuel that can be or is burned in the particular type of boiler, whether or not the combustion unit is permitted to burn that traditional fuel. In comparing contaminants between traditional fuel(s) and a non-hazardous secondary material, persons can use data for traditional fuel contaminant levels compiled from national surveys, as well as contaminant level data from the specific traditional fuel being replaced. To account for natural variability in contaminant levels, persons can use the full range of traditional fuel contaminant levels, provided such comparisons also consider variability in non-hazardous secondary material contaminant levels. Such comparisons are to be based on a direct comparison of the contaminant levels in both the non-hazardous secondary material and traditional fuel(s) prior to combustion.

(2) Legitimacy criteria for non-hazardous secondary materials used as an ingredient in combustion units include the following:

(i) The non-hazardous secondary material must be managed as a valuable commodity based on the following factors:

(A) The storage of the non-hazardous secondary material prior to use must not exceed reasonable time frames;

(B) Where there is an analogous ingredient, the non-hazardous secondary material must be managed in a manner consistent with the analogous ingredient or otherwise be adequately contained to prevent releases to the environment;

(C) If there is no analogous ingredient, the non-hazardous secondary material must be adequately contained to prevent releases to the environment;

(ii) The non-hazardous secondary material must provide a useful contribution to the production or manufacturing process. The non-hazardous secondary material provides a useful contribution if it contributes a valuable ingredient to the product or intermediate or is an effective substitute for a commercial product.

(iii) The non-hazardous secondary material must be used to produce a valuable product or intermediate. The product or intermediate is valuable if:

(A) The non-hazardous secondary material is sold to a third party, or

(B) The non-hazardous secondary material is used as an effective substitute for a commercial product or as an ingredient or intermediate in an industrial process.

(iv) The non-hazardous secondary material must result in products that contain contaminants at levels that are comparable in concentration to or lower than those found in traditional products that are manufactured without the non-hazardous secondary material.

241.4(a):

(a) The following non-hazardous secondary materials are not solid wastes when used as a fuel in a combustion unit:

(1) Scrap tires that are not discarded and are managed under the oversight of established tire collection programs, including tires removed from vehicles and off-specification tires.

(2) Resinated wood.

(3) Coal refuse that has been recovered from legacy piles and processed in the same manner as currently-generated coal refuse.

(4) Dewatered pulp and paper sludges that are not discarded and are generated and burned on-site by pulp and paper mills that burn a significant portion of such materials where such dewatered residuals are managed in a manner that preserves the meaningful heating value of the materials.

To incorporate these regulations, a permit condition was written as requested by the facility, as follows:

Wood materials combusted in the Kipper Boiler shall be either "clean cellulosic biomass" (as defined in 40 CFR 241.2) or fuels produced from the processing of discarded non-hazardous secondary materials and that meet the legitimacy criteria specified in 40 CFR 241.3(d)(1). If wood materials that do not meet these requirements are combusted in the Kipper the permittee shall comply with applicable provisions for units combusting non-hazardous solid waste enacted in accordance with 40 CFR Subpart DDDD.

(Back to 40 CFR 63.11225)

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

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

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

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

The applicable provisions have been incorporated as a permit condition.

(3) For sources that demonstrate compliance through fuel analysis, a copy of all calculations and supporting documentation that were done to demonstrate compliance with the mercury emission limits.

Supporting documentation should include results of any fuel analyses. You can use the results from one fuel analysis for multiple boilers provided they are all burning the same fuel type.

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

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

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

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

(ii) Person conducting the monitoring.

(iii) Technique or method used.

(iv) Operating conditions during the activity.

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

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

It doesn't appear that this applies to a boiler that is only subject to tune-ups and the one-time energy assessment.

(break in section)

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

(break in section)

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

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

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

(break in section)

This could apply when the facility switches to burning coal. Check definition of fuel subcategories.

Subpart DDDD applies to incinerators.

40 CFR 60.2875 defines Incinerator as follows: *Incinerator means any furnace used in the process of combusting solid waste (as that term is defined by the Administrator in 40 CFR part 241) for the purpose of reducing the volume of the waste by removing combustible matter. Incinerator designs include single chamber and two-chamber.*

The facility is not combusting solid waste for the purpose of reducing the volume of the waste.

7.7 CAM Applicability (40 CFR 64)

The Kipper boiler is a CAM affected source and the multiclone pressure drop range is a compliance indicator.

7.8 Acid Rain Permit (40 CFR 72-75)

The Basic American Foods Rexburg source is not an affected source subject to the Acid Rain Permit program in 40 CFR 72-75.

8. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from June 11 – July 11, 2013. During this time, no comments were submitted in response to DEQ's proposed action.

9. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on July 16, 2013 via e-mail. On July 17, 2013, EPA Region 10 responded to DEQ via e-mail indicating that EPA has reviewed the proposed permit action and will not object to its issuance. .

Appendix A – Emissions Inventory

Summary of Potential Emissions -
Rexburg Facility of Basic American Foods

Production Process	Stack Identification	Estimated Annual Emissions, lbs										
		CO	NOX	SO2	PM	PM-10	PM-2.5	VOC	Lead	GHG		
Boilers	Kipper Boiler	263.9	123.2	214.0	74.7	71.2	73.2	12.9	1.89E-02	75,277		
Boilers	Boiler 1	18.76	22.33	0.54	1.70	1.70	1.70	1.23	1.12E-04	26,623		
Boilers	Boiler 2	18.00	21.43	0.51	1.63	1.63	1.63	1.18	1.07E-04	25,548		
Process A	7020	-	-	-	3.13	1.82	1.59	-	NA	NA		
Process A	7101	7.40	1.42	0.51	12.51	9.47	7.86	0.15	1.40E-05	3,328		
Process A	7102	7.40	1.42	0.51	12.51	9.47	7.86	0.15	1.40E-05	3,328		
Process A	7019	7.52	1.45	0.96	5.18	3.48	10.90	0.16	1.42E-05	3,379		
Process A	7001	-	-	0.11	1.18	1.03	0.94	-	NA	NA		
Process A	7027	-	-	-	0.34	0.18	0.09	-	NA	NA		
Process A	7006	-	-	-	0.89	0.54	0.27	-	NA	NA		
Process B	5034	-	-	-	0.22	0.07	0.04	-	NA	NA		
Process B	5037	-	-	-	7.52	5.66	4.69	-	NA	NA		
Process B	4000	-	-	1.14	8.81	7.53	7.22	-	NA	NA		
Process B	228	11.00	2.12	0.84	5.61	4.80	4.60	0.23	2.07E-05	4,946		
Process B	234	7.33	1.41	0.28	1.61	1.37	1.31	0.15	1.38E-05	3,297		
Process B	311	-	-	0.20	1.50	1.28	1.23	-	NA	NA		
Process B	312	-	-	0.20	1.50	1.28	1.23	-	NA	NA		
Process B	410411	-	-	0.39	3.01	2.57	2.46	-	NA	NA		
Process B	613/614	-	-	0.74	5.60	4.80	4.59	-	NA	NA		
Process B	613/616	-	-	0.56	4.38	3.74	3.58	-	NA	NA		
Process B	638	-	-	0.16	1.24	1.05	1.01	-	NA	NA		
Process B	707	-	-	-	0.01	0.01	0.00	-	NA	NA		
Process B	725	-	-	-	0.21	0.21	0.21	-	NA	NA		
Process B	8	-	-	-	0.21	0.21	0.21	-	NA	NA		
Process B	5001	-	-	-	2.13	1.07	0.53	-	NA	NA		
Process B	5000	-	-	-	0.21	0.21	0.21	-	NA	NA		
Process B	432	-	-	-	0.21	0.21	0.21	-	NA	NA		
Process B	322	-	-	-	0.00	0.00	0.00	-	NA	NA		
Process B	572	-	-	-	1.00	0.25	0.13	-	NA	NA		
Total - Stacks		341.3*	174.7	229.8	158.8	136.8	139.5	16.1	0.02	145,726		

* The plant has a 249 tpy enforceable limit on CO emissions.

** The plant has a 99,000 tpy enforceable limit on CO2e emissions.

Fugitive Emissions

Summary of Potential Emissions -
Rexburg Facility of Basic American Foods

Plant	Woodpile	-	-	28.16	7.04	0.70	14.92	NA	NA
Plant	Heaters	17.54	3.37	0.50	0.50	0.50	0.36	3.31E-05	7.885
Plant	Plant Roads	-	-	-	-	-	-	NA	NA
Total - Fugitive		17.5	3.4	28.7	7.5	1.2	15.3	0.0	0.0
Total - Plantwide		358.9	178.1	187.4	144.4	140.7	31.4	0.0	0.0

Summary of Potential Emissions -
Rexburg Facility of Basic American Foods

NA	0.00
7,892	0.12
NA	0.00

Table B-2. Carbon Monoxide Emission Factors

Annual Emissions	
Basis for Factor	
<p>Because CO emissions are greater with wood-firing than with coal firing, emissions are based on 100% firing with wood fuel. Wood fuel emission factor is from 1994 Source Emission Evaluation Report, adjusted for increase in boiler efficiency due to installation of economizer.</p>	
<p>Based on AP-42, Table 1.4-1 (7/98), for uncontrolled combustion in boiler < 100 MMBTU/hr, and assuming 1020 BTU/scf. No difference between hourly and annual emission factors.</p>	
<p>Based on AP-42, Table 1.4-1 (7/98), for uncontrolled combustion in boiler < 100 MMBTU/hr, and assuming 1020 BTU/scf. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. No difference between hourly and annual emission factors.</p>	
<p></p>	

Table B-4. Nitrogen Oxides Emission Factors

Annual Emissions	
Basis for Factor	
<p>Because NOx emissions are greater with coal:wood-firing than with only wood firing, emissions are based on firing with a 50% coal:wood mixture. Wood fuel emission factor is from 1994 Source Emission Evaluation Report, adjusted for increase in boiler efficiency due to installation of economizer. Coal emission factor is from AP-42, Table 1.1-3, based on 9500 Btu/lb of coal.</p>	
<p>Based on AP-42, Table 1.4-1 (7/98), for uncontrolled combustion in boiler < 100 MMBTU/hr, and assuming 1020 BTU/scf. No difference between hourly and annual emission factors.</p>	
<p>Based on AP-42, Table 1.4-1 (7/98), for uncontrolled combustion in boiler < 100 MMBTU/hr, and assuming 1020 BTU/scf. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. No difference between hourly and annual emission factors.</p>	
<p>Based on results of emission measurements of similar bar burners completed at the BAF Blackfoot Plant. Emission factor divided equally between both process stacks.</p>	

Table B-6. Sulfur Dioxide Emission Factors

Production Process	Stack Identification Code	Process Related SO ₂ Emissions			Annual Emissions		
		Emission Factor	Emission Factor Units	Basis for Emission Factor	Emsn Factor	Emsn Factor Units	Basis for Emission Factor
Boilers	Kipper Boiler	0.00	NA	NA	214.0000	ton/yr	Enforceable emissions limit.
Boilers	Boiler 1	0.00	NA	NA	0.0024	lb SO ₂ /MMBTU	Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf and assuming 1020 BTU/scf and 0.8 gr/Ccf sulfur content of natural gas.
Boilers	Boiler 2	0.00	NA	NA	0.0024	lb SO ₂ /MMBTU	Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf and assuming 1020 BTU/scf and 0.8 gr/Ccf sulfur content of natural gas.
Process A	7101	0.005	lb SO ₂ /000 lb unit process throughput	Based on results of emission measurements completed on similar dryer at the BAF Blackfoot Plant.	0.0024	lb SO ₂ /MMBTU	Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf and assuming 1020 BTU/scf and 0.8 gr/Ccf sulfur content of natural gas.
Process A	7102	0.005	lb SO ₂ /000 lb unit process throughput	Based on results of emission measurements completed on similar dryer at the BAF Blackfoot Plant.	0.0024	lb SO ₂ /MMBTU	Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf and assuming 1020 BTU/scf and 0.8 gr/Ccf sulfur content of natural gas.
Process A	7019	0.005	lb SO ₂ /000 lb unit process throughput	Based on results of emission measurements completed on similar dryer at the BAF Blackfoot Plant.	0.0024	lb SO ₂ /MMBTU	Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf and assuming 1020 BTU/scf and 0.8 gr/Ccf sulfur content of natural gas.
Process A	7001	0.005	lb SO ₂ /000 lb unit process throughput	Based on results of emission measurements completed on similar dryer at the BAF Blackfoot Plant.	0.0000	NA	NA

Table B-6. Sulfur Dioxide Emission Factors

Process B	5037	0.11	lbs SO2/000 lbs product	Estimated 10% conversion of sulfite to SO2 within process.	0.0000	NA	NA
Process B	4000	0.065	lbs SO2/000 lbs product	Sum of emissions from stacks 4000, 228 and 234 assumed to be the same as sum of measured emissions from stacks HEB and HNL at Blackfoot Plant. Total process emissions allocated to these stacks based on portion of drying completed at each stage.	0.0000	NA	NA
Process B	228	0.042	lbs SO2/000 lbs product	Sum of emissions from stacks 4000, 228 and 234 assumed to be the same as sum of measured emissions from stacks HEB and HNL at Blackfoot Plant. Total process emissions allocated to these stacks based on portion of drying completed at each stage.	0.0024	lb SO2/MMBTU	Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf and assuming 1020 BTU/scf and 0.8 gr/Ccf sulfur content of natural gas.
Process B	234	0.012	lbs SO2/000 lbs product	Sum of emissions from stacks 4000, 228 and 234 assumed to be the same as sum of measured emissions from stacks HEB and HNL at Blackfoot Plant. Total process emissions allocated to these stacks based on portion of drying completed at each stage.	0.0024	lb SO2/MMBTU	Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf and assuming 1020 BTU/scf and 0.8 gr/Ccf sulfur content of natural gas.
Process B	311	0.030	lbs SO2/000 lbs product	Sum of emissions from stacks 311, 312, and 410411 assumed to be the same as sum of measured emissions from stacks HEB and HNL at Blackfoot Plant. 25% of emission assigned to stack 311.	0.0000	NA	NA
Process B	312	0.030	lbs SO2/000 lbs product	Sum of emissions from stacks 311, 312, and 410411 assumed to be the same as sum of measured emissions from stacks HEB and HNL at Blackfoot Plant. 25% of emission assigned to stack 311.	0.0000	NA	NA

Table B-7. Estimated Sulfur Dioxide Emissions

Production Process	Stack Code	Process						Combustion					
		Annual Emissions						Annual Emissions					
		Emsn Factor	Emsn Factor Units	Optg. Rate	Optg. Rate Units	Emsn Rate, tpy	Emsn Factor	Emsn Factor Units	Optg. Rate	Optg. Rate Units	Emsn Rate, tpy		
Boilers	Kipper Boiler	NA	NA	NA	NA	NA	214,000	ton/yr	1.0	NA	214.00		
Boilers	Boiler 1	NA	NA	NA	NA	NA	0.002	lb SO ₂ /MMBTU	455,520	MMBTU	0.54		
Boilers	Boiler 2	NA	NA	NA	NA	NA	0.002	lb SO ₂ /MMBTU	437,124	MMBTU	0.51		
Process A	7101	0.005	lb SO ₂ /000 lb unit process throughput	178,704	000 lb unit process throughput	0.45	0.002	lb SO ₂ /MMBTU	56,940	MMBTU	0.07		
Process A	7102	0.005	lb SO ₂ /000 lb unit process throughput	178,704	000 lb unit process throughput	0.45	0.002	lb SO ₂ /MMBTU	56,940	MMBTU	0.07		
Process A	7019	0.005	lb SO ₂ /000 lb unit process throughput	357,408	000 lb unit process throughput	0.89	0.002	lb SO ₂ /MMBTU	57,816	MMBTU	0.07		
Process A	7001	0.005	lb SO ₂ /000 lb unit process throughput	44,676	000 lb unit process throughput	0.11	NA	NA	NA	NA	NA		
Process B	5037	0.110	lbs SO ₂ /000 lbs product	148,920	lbs SO ₂ /000 lbs product	8.19	NA	NA	NA	NA	NA		
Process B	4000	0.065	lbs SO ₂ /000 lbs product	35,040	lbs SO ₂ /000 lbs product	1.14	NA	NA	NA	NA	NA		
Process B	228	0.042	lbs SO ₂ /000 lbs product	35,040	lbs SO ₂ /000 lbs product	0.74	0.002	lb SO ₂ /MMBTU	84,622	MMBTU	0.10		
Process B	234	0.012	lbs SO ₂ /000 lbs product	35,040	lbs SO ₂ /000 lbs product	0.21	0.002	lb SO ₂ /MMBTU	56,414	MMBTU	0.07		

Table B-7. Estimated Sulfur Dioxide Emissions

Total Sulfur Dioxide Emissions	Combined Annual Emissions, tpy
	214.0
	0.5
	0.5
	0.5
	0.5
	1.0
	0.1
	8.2
	1.1
	0.8
	0.3

Table B-8. Total Suspended Particulate Emission Factors

Production Process	Stack Identification Code	Annual Emissions	
		Emission Factor	Units
Boilers	Kipper Boiler	0.262	lb PM/000 lbs steam
Plant	Woodpile	1.000	lb PM/ton of wood handled
Boilers	Boiler 1	0.007	lb PM/MMBTU
Boilers	Boiler 2	0.007	lb PM/MMBTU
Process A	7020	0.018	lb PM/000 lbs unit process throughput
Process A	7101	0.140	lb PM/000 lbs unit process throughput
Process A	7102	0.140	lb PM/000 lbs unit process throughput
Process A	7019	0.029	lb PM/000 lbs unit process throughput
Process A	7001	0.053	lb PM/000 lbs unit process throughput
Process A	7027	0.015	lb PM/000 lbs unit process throughput
Process A	7006	0.005	lb PM/000 lbs production process output
Process B	5034	0.003	lb PM/000 lbs production process output
Process B	5037	0.101	lb PM/000 lbs production process output
Process B	4000	0.503	lb PM/000 lbs production process output
Process B	228	0.320	lb PM/000 lbs production process output
Process B	234	0.092	lb PM/000 lbs production process output
Process B	311	0.228	lb PM/000 lbs production process output

Table B-8. Total Suspended Particulate Emission Factors

Process B	312	0.228	lb PM/000 lbs production process output
Process B	410/411	0.458	lb PM/000 lbs production process output
Process B	613/614	0.457	lb PM/000 lbs production process output
Process B	615/616	0.357	lb PM/000 lbs production process output
Process B	638	0.101	lb PM/000 lbs production process output
Process B	707	0.0001	lb PM/000 lb of unit process throughput
Process B	725	0.0016	lb PM/000 lb of unit process throughput
Process B	8	0.0016	lb PM/000 lb of product transported
Process B	5001	0.0160	lb PM/000 lb of product transported
Process B	5000	0.0016	lb PM/000 lb of product transported
Process B	432	0.0016	lb PM/000 lb of product transported
Process B	322	0.0160	lb PM/000 lb of product transported
Process B	572	0.150	lb PM/000 lb of product transported
Plant	Heaters	0.0075	lb PM/MMBTU
Plant	Plant Roads	17.01	lb PM/hr

Table B-8. Total Suspended Particulate Emission Factors

Annual Emissions
Basis for Factor
<p>Because PM emissions are greater with coal:wood-firing than with only wood firing, emissions are based on firing with a 50% coal:wood mixture. Wood fuel emission factor is from 1994 Source Emission Evaluation Report, adjusted for increase in boiler efficiency due to installation of economizer. Coal emission factor is from AP-44, Table 1.1-3, based on 9500 Btu/lb of coal.</p>
<p>From AP-42, Section 10.3 (2/80) for sawdust handling at plywood veneer plant. Maximum wood pile emission occurs when boiler is fired only with wood.</p>
<p>Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf.</p>
<p>Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf.</p>
<p>Based on Method 5 stack test results from February 1998.</p>
<p>Process and stack similarity to Stack DUT at Blackfoot Plant</p>
<p>Process and stack similarity to Stack DUT at Blackfoot Plant</p>
<p>Based on results from Nov. 2011 emissions tests from stack DUV at Blackfoot Facility. See April 2012 report to DEQ on results of stack testing and proposed revisions to emissions factors.</p>
<p>Process and stack similarity to Stack DSO at Blackfoot Plant</p>
<p>Process and stack similarity to Stack DSO at Blackfoot Plant</p>
<p>Process and stack similarity to Stack DUY at Blackfoot Plant</p>
<p>Process and stack similarity to Stack CHV at Blackfoot Plant</p>
<p>Process and stack similarity to Stack CIR at Blackfoot Plant</p>
<p>Total process emission assumed to be the same as Process P8 at Blackfoot Plant; PM emission factor allocated in proportion to stack discharge air flows.</p>
<p>Total process emission assumed to be the same as Process P8 at Blackfoot Plant; PM emission factor allocated in proportion to stack discharge air flows.</p>
<p>Total process emission assumed to be the same as Process P8 at Blackfoot Plant; PM emission factor allocated in proportion to stack discharge air flows.</p>
<p>Process and stack similarity to Process P8 at Blackfoot Plant</p>

Table B-8. Total Suspended Particulate Emission Factors

Process and stack similarity to Process P8 at Blackfoot Plant
Total process emission assumed to be the same as Process P8 at Blackfoot Plant; total process PM emission factor divided equally between stacks.
Total process emission assumed to be the same as Process P8 at Blackfoot Plant; total process PM emission factor allocated in proportion to stack discharge air flows.
Total process emission assumed to be the same as Process P8 at Blackfoot Plant; total process PM emission factor allocated in proportion to stack discharge air flows.
Total process emission assumed to be the same as Process P8 at Blackfoot Plant; total process PM emission factor allocated in proportion to stack discharge air flows.
Process and stack similarity to Stack EUW at Blackfoot Plant. 90% PM removal assumed to occur in fabric filter.
Process and stack similarity to Blackfoot Stack CHI. 90% PM removal assumed to occur in fabric filter.
Process and stack similarity to Blackfoot Stack CHI. 90% PM removal assumed to occur in fabric filter.
Process and stack similarity to Blackfoot Stack CHI.
Process and stack similarity to Blackfoot Stack CHI. Additional 90% PM removal assumed to occur in fabric filter.
Process and stack similarity to Blackfoot Stack CHI. Additional 90% PM removal assumed to occur in fabric filter.
Process and stack similarity to Blackfoot Stack CHI.
AP-42, Table 9.9.1-1 (5/98) for Internal Vibrating Grain Cleaning with cyclone control selected as closest comparable process with emission factor.
Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf.
AP-42 Section 13.2 used to estimate road emissions. Emission details in Appendix B data tables. Emission factor shown is for annual average.

Table B-9. Estimated Total Particulate Emissions

Production Process	Stack Identification Code	Annual Emissions				
		Emission Factor	Emission Factor Units	Operating Rate	Operating Units	Annual Emissions, tpy
Boilers	Kipper Boiler	0.262	lb PM/000 lbs steam	569,400	000 lbs steam	74.72
Plant	Woodpile	1.000	lb PM/ton of wood handled	56,314	lb PM/ton of wood handled	28.16
Boilers	Boiler 1	0.007	lb PM/MMBTU	455,520	lb PM/MMBTU	1.70
Boilers	Boiler 2	0.007	lb PM/MMBTU	437,124	lb PM/MMBTU	1.63
Process A	7020	0.018	lb PM/000 lbs unit process throughput	357,408	lb PM/000 lbs unit process throughput	3.13
Process A	7101	0.140	lb PM/000 lbs unit process throughput	178,704	lb PM/000 lbs unit process throughput	12.51
Process A	7102	0.140	lb PM/000 lbs unit process throughput	178,704	lb PM/000 lbs unit process throughput	12.51
Process A	7019	0.029	lb PM/000 lbs unit process throughput	357,408	lb PM/000 lbs unit process throughput	5.18
Process A	7001	0.053	lb PM/000 lbs unit process throughput	44,676	lb PM/000 lbs unit process throughput	1.18
Process A	7027	0.015	lb PM/000 lbs unit process throughput	44,676	lb PM/000 lbs unit process throughput	0.34
Process A	7006	0.005	lb PM/000 lbs production process output	357,408	lb PM/000 lbs production process output	0.89
Process B	5034	0.003	lb PM/000 lbs production process output	148,920	lb PM/000 lbs production process output	0.22
Process B	5037	0.101	lb PM/000 lbs production process output	148,920	lb PM/000 lbs production process output	7.52
Process B	4000	0.503	lb PM/000 lbs production process output	35,040	lb PM/000 lbs production process output	8.81
Process B	228	0.320	lb PM/000 lbs production process output	35,040	lb PM/000 lbs production process output	5.61
Process B	234	0.092	lb PM/000 lbs production process output	35,040	lb PM/000 lbs production process output	1.61
Process B	311	0.228	lb PM/000 lbs production process output	13,140	lb PM/000 lbs production process output	1.50
Process B	312	0.228	lb PM/000 lbs production process output	13,140	lb PM/000 lbs production process output	1.50
Process B	410/411	0.458	lb PM/000 lbs production process output	13,140	lb PM/000 lbs production process output	3.01

Table B-10. PM10 Emission Factors

Production Process	Stack Identification Code	Annual Emissions	
		Emission Factor	Units
Boilers	Kipper Boiler	71.200	ton PM-10/yr
Plant	Woodpile	0.250	lb PM-10/ton of wood handled
Boilers	Boiler 1	0.007	lb PM10/MMBTU
Boilers	Boiler 2	0.007	lb PM10/MMBTU
Process A	7020	0.010	lb PM10/000 lbs unit process throughput
Process A	7101	0.106	lb PM10/000 lbs unit process throughput
Process A	7102	0.106	lb PM10/000 lbs unit process throughput
Process A	7019	0.0195	lb PM10/000 lbs unit process throughput
Process A	7001	0.046	lb PM10/000 lbs unit process throughput
Process A	7027	0.008	lb PM10/000 lbs unit process throughput
Process A	7006	0.003	lb PM10/000 lbs production process output
Process B	5034	0.001	lb PM10/000 lbs production process output
Process B	5037	0.076	lb PM10/000 lbs production process output
Process B	4000	0.430	lb PM10/000 lbs production process output
Process B	228	0.274	lb PM10/000 lbs production process output
Process B	234	0.078	lb PM10/000 lbs production process output
Process B	311	0.195	lb PM10/000 lbs production process output

Table B-10. PM10 Emission Factors

Process B	312	0.195	lb PM10/000 lbs production process output
Process B	410/411	0.391	lb PM10/000 lbs production process output
Process B	613/614	0.391	lb PM10/000 lbs production process output
Process B	615/616	0.305	lb PM10/000 lbs production process output
Process B	638	0.086	lb PM10/000 lbs production process output
Process B	707	0.0001	lb PM10/000 lb of unit process throughput
Process B	725	0.0016	lb PM10/000 lb of unit process throughput
Process B	8	0.0016	lb PM10/000 lb of product transported
Process B	5001	0.0080	lb PM10/000 lb of product transported
Process B	5000	0.0016	lb PM10/000 lb of product transported
Process B	432	0.0016	lb PM10/000 lb of product transported
Process B	322	0.0080	lb PM10/000 lb of product transported
Process B	572	0.038	lb PM10/000 lb of product transported
Plant	Heaters	0.0075	lb PM10/MMBTU
Plant	Plant Roads	3.42	lb PM10/hr

Table B-10. PM10 Emission Factors

Process and stack similarity to Process P8 at Blackfoot Plant.
Total process emission assumed to be the same as Process P8 at Blackfoot Plant. 50 % of process emissions allocated to this stack.
Total process emission assumed to be the same as Process P8 at Blackfoot Plant. Total process PM10 emission factor allocated in proportion to stack discharge air flow.
Total process emission assumed to be the same as Process P8 at Blackfoot Plant. Total process PM10 emission factor allocated in proportion to stack discharge air flow.
Total process emission assumed to be the same as Process P8 at Blackfoot Plant. Total process PM10 emission factor allocated in proportion to stack discharge air flow.
Process and stack similarity to Stack EUW at Blackfoot Plant. 90% PM removal assumed to occur in fabric filter. With fabric filter all PM emitted assumed to be PM-10.
Process and stack similarity to Blackfoot Stack CHI. 90% PM removal assumed to occur in fabric filter. With fabric filter all PM emitted assumed to be PM-10.
Process and stack similarity to Blackfoot Stack CHI. 90% PM removal assumed to occur in fabric filter. With fabric filter all PM emitted assumed to be PM-10.
Process and stack similarity to Blackfoot Stack CHI. 50.0% of solid TSP emissions assumed to be PM10, based on AP-42 Table 9.9.1-2, Note g.
Process and stack similarity to Blackfoot Stack CHI. 90% PM removal assumed to occur in fabric filter. With fabric filter all PM emitted assumed to be PM-10.
Process and stack similarity to Blackfoot Stack CHI. 90% PM removal assumed to occur in fabric filter. With fabric filter all PM emitted assumed to be PM-10.
Process and stack similarity to Blackfoot Stack CHI. 50.0% of solid TSP emissions assumed to be PM10, based on AP-42 Table 9.9.1-2, Note g.
AP-42, Table 9.9.1-1 (5/98) for Internal Vibrating Grain Cleaning with cyclone control selected as closest comparable process with emission factor. Per Note j of Table 9.9.1-1, PM10 assumed to be 25 % of TSP.
Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf. All PM assumed to be PM10.
AP-42 Section 13.2 used to estimate road emissions. Emission details in Appendix B data tables. Emission factor shown is for annual average.

Table B-11. Estimated PM10 Emissions

Production Process	Stack Identification Code	Annual Emissions				
		Emission Factor	Emission Factor Units	Operating Rate	Operating Units	Annual Emissions, tpy
Boilers	Kipper Boiler	71.200	ton PM-10/yr	1	-	71.20
Plant	Woodpile	0.250	lb PM-10/ton of wood handled	56,314	lb PM-10/ton of wood handled	7.04
Boilers	Boiler 1	0.007	lb PM10/MMBTU	455,520	lb PM10/MMBTU	1.70
Boilers	Boiler 2	0.007	lb PM10/MMBTU	437,124	lb PM10/MMBTU	1.63
Process A	7020	0.010	lb PM10/000 lbs unit process throughput	357,408	lb PM10/000 lbs unit process throughput	1.82
Process A	7101	0.106	lb PM10/000 lbs unit process throughput	178,704	lb PM10/000 lbs unit process throughput	9.47
Process A	7102	0.106	lb PM10/000 lbs unit process throughput	178,704	lb PM10/000 lbs unit process throughput	9.47
Process A	7019	0.020	lb PM10/000 lbs unit process throughput	357,408	lb PM10/000 lbs unit process throughput	3.48
Process A	7001	0.046	lb PM10/000 lbs unit process throughput	44,676	lb PM10/000 lbs unit process throughput	1.03
Process A	7027	0.008	lb PM10/000 lbs unit process throughput	44,676	lb PM10/000 lbs unit process throughput	0.18
Process A	7006	0.003	lb PM10/000 lbs production process output	357,408	lb PM10/000 lbs production process output	0.54
Process B	5034	0.001	lb PM10/000 lbs production process output	148,920	lb PM10/000 lbs production process output	0.07
Process B	5037	0.076	lb PM10/000 lbs production process output	148,920	lb PM10/000 lbs production process output	5.66
Process B	4000	0.430	lb PM10/000 lbs production process output	35,040	lb PM10/000 lbs production process output	7.53
Process B	228	0.274	lb PM10/000 lbs production process output	35,040	lb PM10/000 lbs production process output	4.80
Process B	234	0.078	lb PM10/000 lbs production process output	35,040	lb PM10/000 lbs production process output	1.37
Process B	311	0.195	lb PM10/000 lbs production process output	13,140	lb PM10/000 lbs production process output	1.28

Table B-10. PM10 Emission Factors

Annual Emissions
Basis for Factor
Enforceable emissions limit.
From AP-42, Section 10.3 (2/80) for sawdust handling at plywood veneer plant. PM-10 is assumed to be 25% of PM. Maximum wood pile emission occurs when boiler is fired only with wood.
Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf. All PM assumed to be PM10.
Based on AP-42, Table 1.4-2 (7/98), for uncontrolled combustion and assuming 1020 BTU/scf. All PM assumed to be PM10.
PM10 assumed to be 58.1% of TSP emissions. This fraction is the same as the fraction of solid PM that is PM10 measured in Stack DUT at Blackfoot Plant.
Process and stack similarity to Stack DUT at Blackfoot Plant
Process and stack similarity to Stack DUT at Blackfoot Plant
Based on results from Nov. 2011 emissions tests from stack DUV at Blackfoot Facility. See April 2012 report to DEQ on results of stack testing and proposed revisions to emissions factors.
Process and stack similarity to Stack DSO at Blackfoot Plant
Process and stack similarity to Stack DSK at Blackfoot Plant
Process and stack similarity to Stack DUY at Blackfoot Plant
Process and stack similarity to Stack CHV at Blackfoot Plant
Process and stack similarity to Stack CIR at Blackfoot Plant
Total process emission assumed to be the same as Process P8 at Blackfoot Plant. Total process PM10 emission factor allocated in proportion to stack discharge air flow.
Total process emission assumed to be the same as Process P8 at Blackfoot Plant. Total process PM10 emission factor allocated in proportion to stack discharge air flow.
Total process emission assumed to be the same as Process P8 at Blackfoot Plant. Total process PM10 emission factor allocated in proportion to stack discharge air flow.
Process and stack similarity to Process P8 at Blackfoot Plant.

Table B-12. Volatile Organic Carbon Emission Factors

Production Process	Stack Identification Code			Annual Emissions
		Emission Factor	Units	
Boilers	Kipper Boiler	0.049	lb VOC/000 lbs steam	
Plant	Woodpile	0.530	lb VOC/ton of wood	
Boilers	Boiler 1	0.005	lb VOC/MMBTU	
Boilers	Boiler 2	0.005	lb VOC/MMBTU	
Process A	7101	0.005	lb VOC/MMBTU	
Process A	7102	0.005	lb VOC/MMBTU	
Process A	7019	0.005	lb VOC/MMBTU	
Process B	228	0.005	lb VOC/MMBTU	
Process B	234	0.005	lb VOC/MMBTU	
Plant	Heaters	0.005	lb VOC/MMBTU	

Table B-12. Volatile Organic Carbon Emission Factors

Annual Emissions
Basis for Factor
<p>Because VOC emissions are greater with wood-firing than with coal firing, emissions are based on 100% firing with wood fuel. Wood fuel emission factor is from 1994 Source Emission Evaluation Report, adjusted for increase in boiler efficiency due to installation of economizer.</p>
<p>From measurements made at wood chip piles by Axelsson et. al, 1992. Measurements of terpene emissions from wood chip piles using Fourier transform infrared spectroscopy, Nordic Pulp and Paper Research Journal. (Emission factor in lb/ton of wood is based on VOC emission factor of 0.0095 lb/m²-day. Estimated maximum footprint of woodpile is 8600 m², leading to estimated emissions of 3.41 lb/hr. Boiler max fuel usage at 90 MMBTU/hr heat input and 7,000 BTU/lb of wood is 6.43 tons wood/hr, yielding an emission factor of 0.53 lb VOC/ton of wood.)</p>
<p>Based on AP-42, Table 1.4-2 (7/98), for uncontrolled natural gas combustion, and assuming 1020 Btu/scf.</p>
<p>Based on AP-42, Table 1.4-2 (7/98), for uncontrolled natural gas combustion, and assuming 1020 Btu/scf.</p>
<p>Based on AP-42, Table 1.4-2 (7/98), for uncontrolled natural gas combustion, and assuming 1020 Btu/scf.</p>
<p>Based on AP-42, Table 1.4-2 (7/98), for uncontrolled natural gas combustion, and assuming 1020 Btu/scf.</p>
<p>Based on AP-42, Table 1.4-2 (7/98), for uncontrolled natural gas combustion, and assuming 1020 Btu/scf.</p>
<p>Based on AP-42, Table 1.4-2 (7/98), for uncontrolled natural gas combustion, and assuming 1020 Btu/scf.</p>
<p>Based on AP-42, Table 1.4-2 (7/98), for uncontrolled natural gas combustion, and assuming 1020 Btu/scf.</p>
<p>Based on AP-42, Table 1.4-2 (7/98), for uncontrolled natural gas combustion, and assuming 1020 Btu/scf.</p>

Table B-14. Lead Emission Factors

Production Process	Stack Identification Code	Emission Factor	Emission Factor Units	Basis for Factor
Boilers	Kipper Boiler	0.000066	lb Lead/000 lb steam	Based on 100% firing with wood fuel. AP-42, Table 1.6-4 (9/03 update) Converted to steam rate assuming 7000 BTU/lb of fuel and 1,385 Btu heatinput/lb of steam.
Boilers	Boiler 1	4.9E-07	lbs Pb/ MM Btu	Based on AP-42 emission factor of 0.0005 lbs Pb/MMscf of fuel combusted and 102 BTU/scf natural gas heat value
Boilers	Boiler 2	4.9E-07	lbs Pb/ MM Btu	Based on AP-42 emission factor of 0.0005 lbs Pb/MMscf of fuel combusted.
Process A	7101	4.9E-07	lbs Pb/ MM Btu	Based on AP-42 emission factor of 0.0005 lbs Pb/MMscf of fuel combusted.
Process A	7102	4.9E-07	lbs Pb/ MM Btu	Based on AP-42 emission factor of 0.0005 lbs Pb/MMscf of fuel combusted.
Process A	7019	4.9E-07	lbs Pb/ MM Btu	Based on AP-42 emission factor of 0.0005 lbs Pb/MMscf of fuel combusted.
Process B	228	4.9E-07	lbs Pb/ MM Btu	Based on AP-42 emission factor of 0.0005 lbs Pb/MMscf of fuel combusted.
Process B	234	4.9E-07	lbs Pb/ MM Btu	Based on AP-42 emission factor of 0.0005 lbs Pb/MMscf of fuel combusted.
Plant	Heaters	4.9E-07	lbs Pb/ MM Btu	Based on AP-42 emission factor of 0.0005 lbs Pb/MMscf of fuel combusted.

Table B-15. Estimated Lead Emissions

Production Process	Stack Identification Code	Emission Factor	Emission Factor Units	Annual Operating Factor	Annual Operating Units	Annual Emissions, tpy
Boilers	Kipper Boiler	6.65E-05	lb Lead/000 lbs steam	569,400	000 lbs steam	1.89E-02
Boilers	Boiler 1	4.90E-07	lbs Pb/ MM Btu	455,520	MM Btu	1.12E-04
Boilers	Boiler 2	4.90E-07	lbs Pb/ MM Btu	437,124	MM Btu	1.07E-04
Process A	7101	4.90E-07	lbs Pb/ MM Btu	56,940	MM Btu	1.40E-05
Process A	7102	4.90E-07	lbs Pb/ MM Btu	56,940	MM Btu	1.40E-05
Process A	7019	4.90E-07	lbs Pb/ MM Btu	57,816	MM Btu	1.42E-05
Process B	228	4.90E-07	lbs Pb/ MM Btu	84,622	MM Btu	2.07E-05
Process B	234	4.90E-07	lbs Pb/ MM Btu	56,414	MM Btu	1.38E-05
Plant	Heaters	4.90E-07	lbs Pb/ MM Btu	134,904	MM Btu	3.31E-05

Table B-16 Greenhouse Gas (GHG) Emission Factors

	Annual Emissions
	Basis for Factor
	<p>Because GHG emissions are greater with wood-firing than with coal firing, emissions are based on 100% firing with wood fuel. Wood and coal GHG emission factors are the sum of CO₂, CH₄, and N₂O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C.</p>
	<p>GHG emission factor is the sum of CO₂, CH₄, and N₂O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C.</p>
	<p>GHG emission factor is the sum of CO₂, CH₄, and N₂O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C.</p>
	<p>GHG emission factor is the sum of CO₂, CH₄, and N₂O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C.</p>
	<p>GHG emission factor is the sum of CO₂, CH₄, and N₂O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C.</p>
	<p>GHG emission factor is the sum of CO₂, CH₄, and N₂O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C.</p>
	<p>GHG emission factor is the sum of CO₂, CH₄, and N₂O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C.</p>
	<p>GHG emission factor is the sum of CO₂, CH₄, and N₂O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C.</p>
	<p>GHG emission factor is the sum of CO₂, CH₄, and N₂O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C.</p>

Table B-18. CO2e Emission Factors

	Annual Emissions
	Basis for Factor
	<p>Because CO2e emissions are greater with wood-firing than with coal firing, emissions are based on 100% firing with wood fuel. Wood and coal CO2e emission factors are the sum of CO2, CH4, and N2O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C, weighted by the Global warming factors listed in Table A-1 of 40 CFR 98.</p>
	<p>CO2e emission factor is the sum of CO2, CH4, and N2O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C, weighted by the global warming factors listed in Table A-1 of 40 CFR 98.</p>
	<p>CO2e emission factor is the sum of CO2, CH4, and N2O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C, weighted by the global warming factors listed in Table A-1 of 40 CFR 98.</p>
	<p>CO2e emission factor is the sum of CO2, CH4, and N2O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C, weighted by the global warming factors listed in Table A-1 of 40 CFR 98.</p>
	<p>CO2e emission factor is the sum of CO2, CH4, and N2O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C, weighted by the global warming factors listed in Table A-1 of 40 CFR 98.</p>
	<p>CO2e emission factor is the sum of CO2, CH4, and N2O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C, weighted by the global warming factors listed in Table A-1 of 40 CFR 98.</p>
	<p>CO2e emission factor is the sum of CO2, CH4, and N2O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C, weighted by the global warming factors listed in Table A-1 of 40 CFR 98.</p>
	<p>CO2e emission factor is the sum of CO2, CH4, and N2O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C, weighted by the global warming factors listed in Table A-1 of 40 CFR 98.</p>
	<p>CO2e emission factor is the sum of CO2, CH4, and N2O emission factors from Tables C-1 and C-2 of 40 CFR 98 Subpart C, weighted by the global warming factors listed in Table A-1 of 40 CFR 98.</p>

Table B-20. Hazardous Air Pollutant Emission Factors for Natural Gas - External Combustion

HAPs - nat gas. Based on AP-42 Emission Factors

heat content of natural gas 1020 Btu/scf

Pollutant	Emission Factor	
	lb/MMScf	lb/MMBtu
Lead	5.00E-04	4.90E-07
POM (sum of POM constituents listed below)	8.82E-05	8.65E-08
2-Methylnaphthalene	2.40E-05	
3-Methylchloranthrene	1.80E-06	
7,12-Dimethylbenz(a)anthracene	1.60E-05	
Acenaphthene	1.80E-06	
Acenaphthylene	1.80E-06	
Anthracene	2.40E-06	
Benz(a)anthracene	1.80E-06	
Benzo(a)pyrene	1.20E-06	
Benzo(b)fluoranthene	1.80E-06	
Benzo(g,h,i)perylene	1.20E-06	
Benzo(k)fluoranthene	1.80E-06	
Chrysene	1.80E-06	
Dibenzo(a,h)anthracene	1.20E-06	
Fluoranthene	3.00E-06	
Fluorene	2.80E-06	
Indeno(1,2,3-cd)pyrene	1.80E-06	
Phenanathrene	1.70E-05	
Pyrene	5.00E-06	
Benzene	2.10E-03	2.06E-06
Dichlorobenzene	1.20E-03	1.18E-06
Formaldehyde	7.50E-02	7.35E-05
Hexane	1.80E+00	1.76E-03
Naphthalene	6.10E-04	5.98E-07
Toluene	3.40E-03	3.33E-06
Arsenic	2.00E-04	1.96E-07
Beryllium	1.20E-05	1.18E-08
Cadmium	1.10E-03	1.08E-06
Chromium	1.40E-03	1.37E-06
Cobalt	8.40E-05	8.24E-08
Manganese	3.80E-04	3.73E-07
Mercury	2.60E-04	2.55E-07
Nickel	2.10E-03	2.06E-06
Selenium	2.40E-05	2.35E-08

Total HAP Emission Factor: 1.85E-03

Largest Emission Factor (Hexane): 1.76E-03

From AP-42, Chapter 1.4 and based on 1020 BTU/scf

Table B-21. Hazardous Air Pollutant Emission Factors for Wood Fuel - External Combustion

HAPs - wood From AP-42, Chapter 1.6

heat input of steam, BTU per lb of steam

1500

Pollutant	Emission Factor	
	lb/MMBTU	
Acetaldehyde		8.30E-04
Acetophenone		3.20E-09
Acrolein		4.00E-03
Benzene		4.20E-03
bis(2-Ethylhexyl)phthalate		4.70E-08
Bromomethane (methyl bromide)		1.50E-05
2-Butanone (MEK)		5.40E-06
Carbon tetrachloride		4.50E-05
Chlorine		7.90E-04
Chlorobenzene		3.30E-05
Chloroform		2.80E-05
Chloromethane (methyl chloride)		2.30E-05
1,2-Dichloroethane		2.90E-05
Dichloromethane		2.90E-04
1,2-Dichloropropane (propylene dichloride)		3.30E-05
2,4-Dinitrophenol		1.80E-07
Ethylbenzene		3.10E-05
Formaldehyde		4.40E-03
Hydrogen chloride		1.90E-02
Naphthalene		9.70E-05
4-Nitrophenol		1.10E-07
Pentachlorophenol		5.10E-08
Phenol		5.10E-05
Propionaldehyde		6.10E-05
Styrene		1.90E-03
2,3,7,8-Tetrachlorodibenzo-p-dioxins		8.60E-12
Tetrachloroethene		3.80E-05
Toluene		9.20E-04
1,1,1-Trichloroethane (methyl chloroform)		3.10E-05
Trichloroethene		3.00E-05
2,4,6-Trichlorophenol		2.20E-08
Vinyl Chloride		1.80E-05
o-Xylene		2.50E-05
Dibenzofurans - sum of compounds listed below)		1.87E-09
Heptachlorodibenzo-p-furans	2.40E-10	
Hexachlorodibenzo-p-furans	2.80E-10	
Octachlorodibenzo-p-furans	8.80E-11	
Pentachlorodibenzo-p-furans	4.20E-10	
2,3,7,8-Tetrachlorodibenzo-p-furans	9.00E-11	
Tetrachlorodibenzo-p-furans	7.50E-10	
POM (sum of constituents listed below)		1.25E-04
Acenaphthene	9.10E-07	
Acenaphthylene	5.00E-06	
Anthracene	3.00E-06	
Benzo(a)anthracene	6.50E-08	
Benzo(a)pyrene	2.60E-06	
Benzo(b)fluoranthene	1.00E-07	
Benzo(e)pyrene	2.60E-09	
Benzo(g,h,i)perylene	9.30E-08	
Benzo(j,k)fluoranthene	1.60E-07	
Benzo(k)fluoranthene	3.60E-08	

Table B-21. Hazardous Air Pollutant Emission Factors for Wood Fuel - External Combustion

2-Chloronaphthalene	2.40E-09	
Chrysene	3.80E-08	
Dibenzo(a,h)anthracene	9.10E-09	
Fluoranthene	1.60E-06	
Fluorene	3.40E-06	
Indeno(1,2,3,c,d)pyrene	8.70E-08	
2-Methylnaphthalene	1.60E-07	
Naphthalene	9.70E-05	
Perylene	5.20E-10	
Phenanthrene	7.00E-06	
Pyrene	3.70E-06	
Antimony		7.90E-06
Arsenic		2.20E-05
Beryllium		1.10E-06
Cadmium		4.10E-06
Chromium, total		2.10E-05
Chromium, hexavalent		3.50E-06
Cobalt		6.50E-06
Lead		4.80E-05
Manganese		1.60E-03
Mercury		3.50E-06
Nickel		3.30E-05
Selenium		2.80E-06

Largest Emission Factor (Hydrogen chloride): 1.90E-02

Total HAP Emission Factor: 3.88E-02

Total HAP Emission Factor with 90% HCl removal in scrubber: 2.17E-02

From AP-42, Chapter 1.6

Table B-22. Hazardous Air Pollutant Emission Factors for Coal - External Combustion

		HAPs - coal firing (sub-bituminous)	
		heat content	
		heat input of steam, BTU per lb of	
Pollutant		Emission Factor	
		lb/ton	
2,3,7,8-TCDD		1.43E-11	
Total PCDF		1.09E-09	
POM (sum of POM constituents listed below)		2.08E-05	
5-Methyl chrysene	2.20E-08		
Acenaphthene	5.10E-07		
Acenaphthylene	2.50E-07		
Anthracene	2.10E-07		
Benzo(a)anthracene	8.00E-08		
Benzo(a)pyrene	3.80E-08		
Benzo(b,j,k)fluoranthene	1.10E-07		
Benzo(g,h,i)perylene	2.70E-08		
Biphenyl	1.70E-06		
Chrysene	1.00E-07		
Fluoranthene	7.10E-07		
Fluorene	9.10E-07		
Indeno(1,2,3-cd)pyrene	6.10E-08		
Naphthalene	1.30E-05		
Phenanthrene	2.70E-06		
Pyrene	3.30E-07		
Acetaldehyde		5.70E-04	
Acetophenone		1.50E-05	
Acrolein		2.90E-04	
Benzene		1.30E-03	
Benzyl chloride		7.00E-04	
Bis(2-ethylhexyl)phthalate (DEHP)		7.30E-05	
Bromoform		3.90E-05	
Carbon disulfide		1.30E-04	
2-Chloroacetophenone		7.00E-06	
Chlorobenzene		2.20E-05	
Chloroform		5.90E-05	
Cumene		5.30E-06	
Cyanide		2.50E-03	
2,4-Dinitrotoluene		2.80E-07	
Dimethyl sulfate		4.80E-05	
Ethyl benzene		9.40E-05	
Ethyl chloride		4.20E-05	
Ethylene dichloride		4.00E-05	
Ethylene dibromide		1.20E-06	
Formaldehyde		2.40E-04	
Hexane		6.70E-05	
Isophorone		5.80E-04	
Methyl bromide (bromomethane)		1.60E-04	
Methyl chloride		5.30E-04	
Methyl ethyl ketone		3.90E-04	
Methyl hydrazine		1.70E-04	
Methyl methacrylate		2.00E-05	
Methyl tert butyl ether		3.50E-05	

Table B-22. Hazardous Air Pollutant Emission Factors for Coal - External Combustion

Methylene chloride	2.90E-04
Phenol	1.60E-05
Propionaldehyde	3.80E-04
Tetrachloroethylene	4.30E-05
Toluene	2.40E-04
1,1,1-Trichloroethane (methyl chloroform)	2.00E-05
Styrene	2.50E-05
Xylenes	3.70E-05
Vinyl acetate	7.60E-06
Hydrogen chloride	1.2
Hydrogen fluoride	0.15
Antimony	1.80E-05
Arsenic	4.10E-04
Beryllium	2.10E-05
Cadmium	5.10E-05
Chromium	2.60E-04
Cobalt	1.00E-04
Lead	4.20E-04
Manganese	4.90E-04
Mercury	8.30E-05
Nickel	2.80E-04
Selenium	1.30E-03
Largest Emission Factor (Hydrogen chloride):	1.20E+00
Total HAP Emission Factor:	1.36E+00

Total HAP Emission Factor with 90% HCl removal in scrubber: 2.83E-01

From AP-42, Chapter 1.1, assuming 9500 BTU/lb



Table B-22. Hazardous Air Pollutant Emission Factors for Coal - External Combustion

1.53E-05	Tbl 1.1-14
8.42E-07	Tbl 1.1-14
2.00E-05	Tbl 1.1-14
2.26E-06	Tbl 1.1-14
1.26E-05	Tbl 1.1-14
1.05E-06	Tbl 1.1-14
1.32E-06	Tbl 1.1-14
1.95E-06	Tbl 1.1-14
4.00E-07	Tbl 1.1-14
6.32E-02	Tbl 1.1-15
7.89E-03	Tbl 1.1-15
9.47E-07	Tbl 1.1-18
2.16E-05	Tbl 1.1-18
1.11E-06	Tbl 1.1-18
2.68E-06	Tbl 1.1-18
1.37E-05	Tbl 1.1-18
5.26E-06	Tbl 1.1-18
2.21E-05	Tbl 1.1-18
2.58E-05	Tbl 1.1-18
4.37E-06	Tbl 1.1-18
1.47E-05	Tbl 1.1-18
6.84E-05	Tbl 1.1-18

6.32E-02

7.17E-02

1.49E-02

Table B-23. Plant-wide Potential HAP Emissions

Combustion Activity	HAP Emissions, lb/MMBTU	Kipper Wood Fired				Kipper Coal:Wood Fuel Usage*	
		Fuel Usage*		MMBTU/yr	Potential HAP Emissions, tpy	MMBTU/hr	MMBTU/hr
		MMBTU/hr	Hours/yr				
Solid Fuels							
Kipper Boiler - wood	0.0217**	90.0	8760	788,401	8.56	40.0	
Kipper Boiler - coal	0.0149**					40.0	
Natural Gas							
Boiler 1	0.00185	52	8760	455,520	0.42	52	
Boiler 2	0.00185	49.9	8760	437,124	0.40	49.9	
7101	0.00185	6.5	8760	56,940	0.05	6.5	
7102	0.00185	6.5	8760	56,940	0.05	6.5	
7019	0.00185	6.6	8760	57,816	0.05	6.6	
228	0.00185	9.66	8760	84,622	0.08	9.66	
234	0.00185	6.44	8760	56,414	0.05	6.44	
Heaters	0.00185	30.8	4380	134,904	0.12	30.8	
				Total HAP PTE:	9.80		

* Constraints on fuel combustion resulting from plant-wide CO and GHG emissions limits are not considered in these calculations.

** Assumes 90% HCl removal efficiency in scrubber

Table B-23. Plant-wide Potential HAP Emissions

Kipper Coal:Wood Cofired		
Fuel Usage*	MMBTU/yr	Potential HAP Emissions, tpy
Hours/yr		
8760	350,400	3.80
8760	350,400	2.61
8760	455,520	0.42
8760	437,124	0.40
8760	56,940	0.05
8760	56,940	0.05
8760	57,816	0.05
8760	84,622	0.08
8760	56,414	0.05
4380	134,904	0.12
Total HAP PTE:		7.65

Appendix B - Facility Comments for Draft Permit

COMMENTS ON DRAFT PERMIT – Rexburg Facility of Basic American Foods			
REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION
1. Table of Contents		Delete entries for Sections 10 (40 CFR 64 – Compliance Assurance Monitoring) and 11 (Compliance Schedule) and renumber accordingly	These sections are not part of the permit as drafted.
2. Page 5, §1.2	Tier II Operating Permit No. T2-2008.0109, issued June 10, 2008	Delete.	The Tier II Operating Permit was superseded by PTC P-2011.0132
3. Page 5	Table 2.1 lists all sources of regulated emissions in this permit. Table 2.1 Regulated sources.	Change to Table 1.1	Formatting and layout correction.
4. Page 5	Table 2.1 lists all sources of regulated emissions in this permit.	Expand discussion as follows: <i>Table 1.1 lists all sources of regulated emissions in the Tier I 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.</i>	Listing sources here that are insignificant for Tier I permitting purposes unnecessarily complicates the permit. Note that the insignificant sources would still be identified in Table 10.1. Note also that the proposed language and format for this table matches the format used for the BAF Blackfoot Facility Tier I Permit.
5. Page 5	Table 2.1 – list of regulated sources	Delete the following sources from the table which are insignificant on the basis of size or production rate: 7006; 7001; 7027; 5034; 707;234; 725; 8; 5001; 5000; 432; 322; and 572.	Listing sources here that are insignificant for Tier I permitting purposes unnecessarily complicates the permit. Note that the insignificant sources would still be identified in Table 10.1. Note also that the proposed language and format for this table matches the format used for the BAF Blackfoot Facility Tier I Permit.

COMMENTS ON DRAFT PERMIT – Rexburg Facility of Basic American Foods

REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION
6. Page 7, Table 2.1	<p>Kipper & Sons Boiler</p> <p>..</p> <p>Fuels: Coal (39% by weight) and wood</p>	<p>Fuels: Coal (maximum 50% of heat input) and wood</p>	<p>Inconsistent with Condition 3.4, which says 50% by heat input. In practice, the compliance would be demonstrated by heat, not weight.</p>
7. Page 11; §2.21	<p>The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A—“General Provisions”—in accordance with 40 CFR 60.1. A summary of requirements for affected facilities is provided in Table 2.2.</p>	<p>Add the following language: <i>The general provisions of 40 CFR 60, Subpart A are only applicable when there is an emissions unit that is subject one of the other subparts of 40 CFR 60, and the applicability of the general provisions will be as set forth in those other portions of 40 CFR 60.</i></p>	<p>BAF believes that as this section stands it is confusing to a reader who is not familiar with the structure of 40 CFR 60. The suggested language, or equivalent language, will clarify for readers of the permit that these are not universally applicable facility-wide requirements and only come into effect when triggered by specific emissions units.</p> <p>BAF also suggests moving Table 2.2 to an Appendix. This would simplify the content of the main permit.</p>
8. Page 13; §2.22	<p>The permittee shall comply with the requirements of 40 CFR 63, Subpart A – General Provisions. A summary of applicable requirements for affected sources is provided in Table 2.3</p>	<p>Add the following language: <i>The general provisions of 40 CFR 63, Subpart A are only applicable when there is an emissions unit that is subject one of the other subparts of 40 CFR 63 and the applicability of the general provisions will be as set forth in those other portions of 40 CFR 63.</i></p>	<p>BAF believes that as this section stands it is confusing to a reader who is not familiar with the structure of 40 CFR 63. The suggested language, or equivalent language, will clarify for readers of the permit that these are not universally applicable facility-wide requirements and only come into effect when triggered by specific emissions units.</p> <p>BAF also suggests moving Table 2.2 to an Appendix. This would simplify the content of the main permit.</p>

COMMENTS ON DRAFT PERMIT – Rexburg Facility of Basic American Foods

REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION
<p>9. Page 17; §2.25; 2.27</p>	<p>All testing shall be conducted in accordance with ... The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the "Reports and Certifications" facility wide condition (Permit Condition 3.27).</p>	<p>All <i>required</i> testing shall be conducted in accordance with ... <i>For required performance tests</i> the proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the "Reports and Certifications" facility wide condition (Permit Condition 3.27).</p>	<p>When testing is voluntary, there is no need to require that testing be done in accordance with IDAPA 58.01.01.</p>
<p>10. Page 18; §2.29</p>		<p>Add to bullet point list:</p> <ul style="list-style-type: none"> • Solid Wastes Used as Fuels or Ingredients in Combustion Units, 40 CFR 241 	<p>40 CFR 241 contains applicable requirements which should be incorporated by references in the same basis as the NSPS and NESHAP rules.</p>
<p>11. Page 19; §3</p>		<p>Add the following language to the Kipper Boiler "Summary Description": <i>The Kipper boiler is a wood and coal-fired boiler with an original steam production rating of 60,000 pounds per hour. The boiler can burn up to 50% coal on a heat input basis (i.e. 50% of the heating value). The Kipper boiler was installed in 1981, and an economizer was added in 2001, increasing the maximum steam production rate to 65,000 lb/hr due to increased boiler efficiency. Emission controls on the Kipper boiler include a Zurr multiclone dust collector and a Riley Ventri-Rod scrubber.</i> <i>Wood materials combusted in the Kipper Boiler are either "clean cellulosic biomass" (as defined in 40 CFR 241.2) or are fuels produced from the processing of discarded non-hazardous secondary materials and that meet the legitimacy criteria specified in 40 CFR 241.3(d)(1). By combusting wood fuels that only meet these criteria, the Kipper Boiler will not be subject to Subpart DDDD of 40 CFR Part 60 - Emission Guidelines for Commercial/Industrial Solid Waste Incinerators constructed on or before November 30, 1999</i></p>	<p>In part, the proposed language restores content from the existing Tier I permit that BAF prefers to retain. The proposed language also includes clarifying information about the status of the Kipper Boiler with respect to the Boiler MACT and CISWI rules. BAF believes this discussion is important to help readers of the permit understand the status of the Kipper Boiler with respect to those rules.</p>

COMMENTS ON DRAFT PERMIT – Rexburg Facility of Basic American Foods

REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION
12. Page 19; Table 3.2		<p>Table 3.2 should be expanded and reformatted so that the "Permit Condition" and "Paramater" columns include all requirements that are emission limits (numeric limits, operating limits, required work practices), with the MRRR requirements listed in the rightmost column. The attached Table 1 provides BAF's understanding of which permit provisions are emissions limits and which permit provisions establish the MRRR for each of the limits.</p> <p>Condition 3.7 of the permit, which requires the use of a Ventri-Rod Scrubber and multiclone to control particulate emissions, appears to require "gap-filling" as it does not appear to have related MRRR. BAF suggests that this be addressed by including inspection of the Ventri-rod scrubber and multiclone in the Kipper Boiler annual inspection and maintenance required under Permit Condition 3.9.</p>	<p>Table 3.2 appears to conflate non-numeric emissions limitations (operating limits and work practice standards that are required emissions control measures) with MRRR. It appears to BAF that many of the permit conditions listed as MRRR for the Kipper Boiler are actually emission limits that have their own related MRRR. This is because operating limits (such as limits on fuel usage or steam production) or work practice standards (such as boiler tuneup requirements) are implemented specifically as surrogates for numeric emissions limits. As such they are enforceable as emissions limits and have their own attendant MRRR.</p>
13. Page 20; §3.3.3	<p>The proportional heat input shall be determined in accordance with the Steam and Coal Monitoring (permit condition 3.10).</p>	<p>The proportional heat input shall be determined in accordance with the Steam and Coal Monitoring (permit condition 3-10-3.14).</p>	<p>Erroneous cross-reference</p>
14. NA	<p>NA</p>	<p>A new Operating Requirement needs to be added: <i>"Wood materials combusted in the Kipper Boiler shall be either "clean cellulosic biomass" (as defined in 40 CFR 241.2) or fuels produced from the processing of discarded non-hazardous secondary materials and that meet the legitimacy criteria specified in 40 CFR 241.3(d)(1), if wood materials that do not meet these requirements are combusted in the Kipper the permittee shall comply with applicable provisions for units combusting non-hazardous solid waste enacted in accordance with 40 CFR Subpart DDDD."</i></p>	<p>Addition of this operating requirement is necessary to assure that the facility remains subject to 40 CFR 63 Subpart JJJJJ and that 40 CFR 60 Subpart DDDD is inapplicable as long as the facility combusts materials that are determined to not be solid waste as provided in accordance with 40 CFR 241.</p>
15. Page 21; §3.10	<p>In accordance with 40 CFR 63.11223(a), the facility must conduct a performance tune-up according to this permit condition.</p>	<p>In accordance with 40 CFR 63.11223(a), the facility must conduct a performance tune-up of <u>the Kipper Boiler</u> according to this permit condition.</p>	<p>Enhanced clarity</p>

COMMENTS ON DRAFT PERMIT – Rexburg Facility of Basic American Foods

REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION
16. Page 21; §3.10	In accordance with 40 CFR 63.11223(a), the facility must conduct a performance tune-up according to this permit condition.	In accordance with 40 CFR 63.11223(a), the facility must conduct a performance tune-up according to this permit condition <u>and keep records as required by §3.22 of this permit.</u>	Synchs permit language with the most current version of Subpart JJJJJ.
17. Page 21; §3.10	The permittee must conduct a tune-up of the boiler biennially	<u>In accordance with 40 CFR 63.11223(b) the permittee must conduct a tune-up of the boiler biennially</u>	Added clarity
18. Page 21; regulatory citations at the end of §3.10	40 CFR 63.11223(a)	Expand to: <u>40 CFR 63.11201(b), 63.11214(b); 63.11223(a), 63.112123(b)</u>	More complete citation to regulatory authority
19. Page 22; regulatory citations at the end of §3.11	40 CFR 63.11201(b)	Expand to: 40 CFR 63.11201(b) <u>and Table 2</u>	More complete citation to regulatory authority
20. Page 22; §3.12	In accordance with 40 CFR 63.11196(a)(1), the facility must achieve compliance with the work practice or management standard tune-up no later than March 21, 2014.	Change to: In accordance with 40 CFR 63.11196(a)(1), the facility must achieve compliance with the work practice or management standard tune-up <u>of the Kipper Boiler</u> , no later than March 21, 2014.	Added clarity
21. Page 22; regulatory citations at the end of §3.12 and 3.13	40 CFR 63.11196(a)	Expand to: 40 CFR 63.11196(a) <u>and 63.11210(c)</u>	More complete citation to regulatory authority
22. Page 22; §3.14	The steam produced in the boiler	The steam produced in the <u>Kipper</u> boiler	Added clarity
23. Page 25; §3.17	the permittee shall conduct the monitoring required under this permit upon issuance.	the permittee shall conduct the monitoring required under this permit <u>P-2011-0132</u> upon issuance.	Permit language cleanup
24. Page 26; §3.22	In accordance with 40 CFR 63.11225(c), the facility must maintain the records specified in paragraphs (1) through (5) of this section.	In accordance with 40 CFR 63.11225(c), the facility must maintain the records specified in paragraphs (1) through (5) <u>(4)</u> of this section <u>pertainning to the Kipper Boiler</u> .	Editorial for added language and for clarity
25. Page 26; §3.22	(2) The facility must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 as specified in paragraphs (c)(2)(i) and (ii) of this section.	(2) The facility must keep records to document conformance with the work practices, emission reduction measures, and management practices required by § 63.11214 <u>and §63.11223 as specified in paragraphs (c)(2)(i) and (ii) of this section, below:</u>	Synchs permit language with the most current version of Subpart JJJJJ. Also editorial for clarity.

COMMENTS ON DRAFT PERMIT – Rexburg Facility of Basic American Foods			
REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION
26. Page 26; §3.22	(i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.	(i) Records must identify each boiler, for the Kipper Boiler the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.	Editorial for clarity
27. Page 26; §3.22	(ii) Records documenting the fuel type(s) used monthly by each boiler, including, but not limited to, a description of the fuel, including whether the fuel has received a nonwaste determination by the facility or EPA, and the total fuel usage amount with units of measure. If the facility combust nonhazardous secondary materials that have been determined not to be solid waste pursuant to § 241.3(b)(1), the facility must keep a record which documents how the secondary material meets each of the legitimacy criteria. If the facility combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to § 241.3(b)(4), the facility must keep records as to how the operations that produced the fuel satisfies the definition of processing in § 241.3(c) of this chapter, the permittee must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust nonhazardous secondary materials as fuel per § 241.4, the permittee must keep records documenting that the material is a listed non-waste under § 241.4(a).	Delete entirely and replace with the following: <i>(ii) For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to § 241.3(b)(1) of this chapter, the permittee must keep a record which documents how the secondary material meets each of the legitimacy criteria under § 241.3(d)(1). If the permittee combusts a fuel that has been processed from a discarded non-hazardous secondary material pursuant to § 241.3(b)(4) of this chapter, the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in § 241.3(c) of this chapter, the permittee must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust nonhazardous secondary materials as fuel per § 241.4, the permittee must keep records documenting that the material is a listed non-waste under § 241.4(a).</i> <i>(iii) The must keep a copy of the energy assessment report required under §63.11201(b) and Table 2 of Subpart JJJJJ.</i>	Synchs permit language with the most current version of Subpart JJJJJ.
28. Page 27; §3.22	(4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in § 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.	(4)(3) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. (5)(4) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in § 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.	Formatting. Deleted language is not applicable to the Kipper Boiler. Because Subpart JJJJJ does not require air pollution control and monitoring equipment for the Kipper, the existing equipment on the Kipper Boiler is not regulated under Subpart JJJJJ.
29. Page 27; §3.22	In accordance with 40 CFR 63.11225(d), the facility's records must be in a form suitable and readily available for expeditious review, according to § 63.10(b)(1). As specified in § 63.10(b)(1), the facility must keep each record for 5 years following the date of each recorded action. The facility must keep each record onsite for at least 2 years after the date of each recorded action according to § 63.10(b)(1). The facility may keep the records off site for the remaining 3 years.	Delete entirely and replace with the following: <i>(d) Your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years.</i>	Synchs permit language with the most current version of Subpart JJJJJ.

COMMENTS ON DRAFT PERMIT – Rexburg Facility of Basic American Foods			
REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION
30. Page 27, §3.24	No later than April 3, 2017, the permittee shall conduct performance test ...	No later than April 3, 2017, the permittee shall conduct g performance test ...	Editorial
31. Page 29	NA	<p>Create new 3.27 and renumber current §3.27 through 3.31 accordingly</p> <p><u>3.27. 40 CFR 60 Subpart JJJJJ Initial Notification and Notification of Compliance Status</u></p> <p><u>The permittee shall submit the notifications specified below to the Administrator:</u></p> <p><u>1. The permittee must submit all of the notifications in §§ 63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to the permittee by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of this section.</u></p> <p><u>2. An Initial Notification must be submitted no later than January 20, 2014.</u></p> <p><u>3. The permittee must submit the Notification of Compliance Status by July 19, 2014. The permittee must submit the Notification of Compliance Status in accordance with paragraphs (i) and (iii) below. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (j) through (v) of this section, and be signed by a responsible official.</u></p> <p><u>i. The permittee must submit the information required in § 63.9(h)(2), except the information listed in § 63.9(h)(2)(i)(B), (D), (E), and (F).</u></p> <p><u>ii. "This facility complies with the requirements in § 63.11214 to conduct an initial tune-up of the boiler."</u></p> <p><u>iii. "This facility has had an energy assessment performed according to § 63.11214(c)."</u></p> <p><u>iv. For units that do not qualify for a statutory exemption as provided in section 129(g)(2) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."</u></p> <p><u>v. The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in § 63.13.</u></p> <p>[40 CFR 63.11225(a)]</p>	<p>Synchs permit language with the most current version of Subpart JJJJJ.</p>

COMMENTS ON DRAFT PERMIT – Rexburg Facility of Basic American Foods		
REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE
32. Page 29; regulatory citations at the end of §3.27		Revise regulatory citation: [40 CFR 63.11214(b) and 63.11225(a)]
33. Page 29; 3.28	In accordance with 40 CFR 63.11214(b), the facility must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed and submit, upon request, the energy assessment report.	Delete entirely and replace with the following text and devise regulatory citation: <u>The permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the Kipper Boiler and its energy use systems was completed according to Table 2 to this subpart and is an accurate depiction of the permittee's facility.</u> [40 CFR 63.11214(c) and 63.11225(a)]
34. Page 30; §3.29	(2) Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart.	Delete entirely and replace with the following: <u>(2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. The permittee's notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:</u> <u>(i) "This facility complies with the requirements in § 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."</u> <u>(ii) For units that do not qualify for a statutory exemption as provided in section 129(a)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."</u> <u>(iii) "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(a) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."</u>

JUSTIFICATION

Synchs permit language with the most current version of Subpart JJJJJ.

Synchs permit language with the most current version of Subpart JJJJJ.

Synchs permit language with the most current version of Subpart JJJJJ.

COMMENTS ON DRAFT PERMIT – Rexburg Facility of Basic American Foods

REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION
35. Page 30: §3.30	<p>In accordance with 40 CFR 63.11225(g), if the facility intends to switch fuels, and this fuel switch may result in the applicability of a different subcategory or a switch out of subpart JJJJJ due to a switch to 100 percent natural gas, the facility must provide 30 days prior notice of the date upon which the facility will switch fuels. The notification must identify: of the affected source, the location of the source, the boiler(s) that will switch fuels, and the date of the notice.</p> <p>(2) The currently applicable subcategory under this subpart.</p> <p>(3) The date on which the facility became subject to the currently applicable standards.</p> <p>(4) The date upon which the facility will commence the fuel switch.</p>	<p>Delete entirely and replace with the following:</p> <p><u><i>If the permittee has switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within subpart JJJJJ, in the boiler becoming subject to subpart JJJJJJ, or in the boiler switching out of subpart JJJJJ due to a change to 100 percent natural gas, or the permittee has taken a permit limit that resulted in the permittee being subject to subpart JJJJJ, the permittee must provide notice of the date upon which the permittee switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:</i></u></p> <p><u><i>(1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.</i></u></p> <p><u><i>(2) The date upon which the fuel switch, physical change, or permit limit occurred.</i></u></p>	<p>Synchs permit language with the most current version of Subpart JJJJJJ.</p>
36. Page 32, §4.4	<p>NSPS-Subpart Dc Applicability, Notification, Monitoring and Reporting Requirements</p> <p>..</p>	<p>Delete entirely.</p>	<p>All of the content of this permit condition is one time notification requirements that have already been completed.</p>
37. Page 33; Table 5.1		<p>Delete from the table the following emissions units:</p> <ul style="list-style-type: none"> • Cooler Dryer 7001 • Cooler/Dryer 7027 • Material Recovery Unit 7006 	<p>These are insignificant emissions units.</p>
38. Page 35; Table 6.1		<p>Delete from the table the following emissions units:</p> <ul style="list-style-type: none"> • Material Recovery Unit 5034 • Material Recovery Unit 707 • Material Recovery Unit 725 • Material Recovery Unit 8 • Material Recovery Unit 5001 • Material Recovery Unit 5000 • Material Recovery Unit 432 • Material Recovery Unit 322 • Material Recovery Unit 572 	<p>These are insignificant emissions units.</p>
39. Page 41; §9	<p>Table 10.1 describes the devices used to control emissions from Plant Space Heaters.</p>	<p>Delete</p>	<p>Appears to be an orphan sentence.</p>

COMMENTS ON DRAFT PERMIT – Rexburg Facility of Basic American Foods

REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION				
40. Page 43; §10.1	<p>Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in Table Error! No text of specified style in document..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 Error! Reference source not found.).</p> <p>Table Error! No text of specified style in document..1 Insignificant activities.</p>	<p>Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in Table-14-1 10.1 to qualify for a permit shield. There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the facility-wide permit conditions (Section Error! Reference source not found. 2).</p>	<p>Formatting and layout corrections.</p>				
41. Page 43; Table 14.1	<p>Table 14.1 Insignificant Activities</p>	<p>Renumber as Table 10.1</p>	<p>Formatting and layout corrections.</p>				
42. Page 44	<p>From the table of Insignificant Activities</p> <table border="1" data-bbox="641 1197 690 1680"> <tr> <td>Process B, stack id. 311/312 (dryer vent)</td> <td align="center">30</td> </tr> <tr> <td>Process B, stack id. 638</td> <td align="center">30</td> </tr> </table>	Process B, stack id. 311/312 (dryer vent)	30	Process B, stack id. 638	30	<p>Delete these two rows from the table.</p>	<p>These are not insignificant emissions units.</p>
Process B, stack id. 311/312 (dryer vent)	30						
Process B, stack id. 638	30						

COMMENTS ON DRAFT SOB – Rexburg Facility of Basic American Foods

REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION		
43. Page 5; §1	<p>"At the time of this permitting action, the facility is not a major source of HAP emissions. As a major facility, Rexburg Facility of Basic American Foods, A Division of Basic American, Inc. (BAF) is required to apply for a Tier 1 operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier 1 operating permit must contain a certification from BAF as to its compliance status with all applicable requirements."</p>	<p>Replace with the following text: <u>Rexburg Facility of Basic American Foods, A Division of Basic American, Inc. (BAF) is a manufacturer of dried food products, and is located at 40 East 7th North, Rexburg. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit PM₁₀, NO_x, CO, and SO₂ above the major source threshold of 100 tons-per-year. At the time of this permitting action, the facility is not a major source of HAP emissions.</u></p>	<p>Clarification and consistency with format of Statement of Basis with other BAF facilities.</p>		
44. Page 6; §2, 1 st ¶	<p>"Since the current T2/PTC was issued, the Erie City boiler that was Boiler 2 has been replaced with a 49.9 MMBTU/hr Murray boiler. This change was exempt from PTC review in accordance with IDAPA 58.01.01.222.02.c."</p>	<p>Delete.</p>	<p>The T2/PTC for the facility was converted to a PTC in June 2012. The replacement Boiler 2 is included in the 2012 PTC.</p>		
45. Page 8; §4.1	<p>Kipper & Sons Boiler ... Fuels: Coal (39% by weight) and wood</p>	<p>Fuels: Coal (maximum 50% of heat input) and wood</p>	<p>See comments on draft permit.</p>		
46. Page 9; Process 4 description	<p>"Table 4.4 lists the emissions units and control devices associated with Process A."</p>	<p>Change to: "Table 4.4 lists the <u>regulated emissions units and control devices associated with Process A.</u>"</p>	<p>Insignificant emissions units need only be listed in the Tier 1 permit, they need not be included in the technical analysis.</p>		
47. Page 9, Table 4.4	<table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td align="center">Emissions Unit ID No.</td> </tr> <tr> <td align="center">...</td> </tr> </table>	Emissions Unit ID No.	...	<p>Delete from the table the following emissions units:</p> <ul style="list-style-type: none"> • Cooler Dryer 7001 • Cooler/Dryer 7027 • Material Recovery Unit 7006 	<p>Insignificant emissions units need only be listed in the Tier 1 permit, they need not be included in the technical analysis.</p>
Emissions Unit ID No.					
...					
48. Page 10; Process 5 description	<p>"Table 4.5 lists the emissions units and control devices associated with Process B."</p>	<p>Change to: "Table 4.5 lists the <u>regulated emissions units and control devices associated with Process B.</u>"</p>	<p>Insignificant emissions units need only be listed in the Tier 1 permit, they need not be included in the technical analysis.</p>		

COMMENTS ON DRAFT SOB – Rexburg Facility of Basic American Foods

REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION		
49. Page 10, Table 4.5	<table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;">Emissions Unit ID No.</td> </tr> <tr> <td style="text-align: center;">...</td> </tr> </table>	Emissions Unit ID No.	...	<p>Delete from the table the following emissions units:</p> <ul style="list-style-type: none"> • Material Recovery Unit 5034 • Material Recovery Unit 707 • Material Recovery Unit 725 • Material Recovery Unit 8 • Material Recovery Unit 5001 • Material Recovery Unit 5000 • Material Recovery Unit 432 • Material Recovery Unit 322 • Material Recovery Unit 572 	<p>Insignificant emissions units need only be listed in the Tier I permit, they need not be included in the technical analysis.</p>
Emissions Unit ID No.					
...					
50. Page 10; Process No. 6 - PROCESS DESCRIPTION		<p>Add the following language:</p> <p><i>"The BAF Rexburg Facility has natural gas-fired space heaters ranging in size from less than 100,000 Btu/hr to 8.8 MMBtu/hr. At the time of permit issuance, total space heater combustion capacity is 30.8 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. Because the heaters do not have discreet exhaust stacks, all heaters are aggregated together and treated as a single source."</i></p>	<p>Process information clarification.</p>		
51. Page 12; Table 4.7	<p>Entry for "Plant Roads"</p>	<p>Add a notation that emissions for Plant Roads are not included because plant roads are fugitive sources.</p>	<p>Clarification</p>		
52. Page 16; Permit Conditions 2.21 - NSPS General Provisions	<p>This facility is subject to NSPS Subpart Dc, and is therefore required to comply with applicable General Provisions.</p>	<p>Add the following language: <i>"The general provisions of 40 CFR 60, Subpart A are only applicable when there is an emissions unit that is subject one of the other subparts of 40 CFR 60, and the applicability of the general provisions will be as set forth in those other portions of 40 CFR 60."</i></p>	<p>See related comments on draft permit.</p>		
53. Page 16; Permit Conditions 2.22 - NESHAP General Provisions	<p>This facility is subject to NESHAP Subpart JJJJJ, and is therefore required to comply with applicable General Provisions.</p>	<p>Add the following language: <i>"The general provisions of 40 CFR 63, Subpart A are only applicable when there is an emissions unit that is subject one of the other subparts of 40 CFR 63, and the applicability of the general provisions will be as set forth in those other portions of 40 CFR 63."</i></p>	<p>See related comments on draft permit.</p>		
54. Page 17; Permit Conditions 2.24 through 2.27 - Performance Testing	<p>All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157.</p>	<p>Change to: <i>"All required testing shall be conducted in accordance with ..."</i></p>	<p>When testing is voluntary, there is no need to require that testing be done in accordance with IDAPA 58.01.01.</p>		
55. Page 17: MRRR (Permit Conditions 2.28)	<p>The permittee shall submit compliance test report(s) to DEQ following testing.</p>	<p>Change to: <i>"The permittee shall submit report(s) for required compliance tests to DEQ following testing."</i></p> <p>Also, this language addresses Permit Conditions 2.26 and 2.27.</p>	<p>When testing is voluntary, there is no need to require that testing reports be submitted in accordance with IDAPA 58.01.01.</p>		

COMMENTS ON DRAFT SOB – Rexburg Facility of Basic American Foods

REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION
<p>56. Page 18++; discussion of Emissions-Unit Specific Emissions Limits and MRR for Kipper Boiler</p>	<p>Various</p>	<p>Revise and reorganize to identify operating requirements and work practice standards (which are forms of emissions limits) and separate them from MRRR. Please refer to the attached Table 1, which summarizes BAF's understanding of which permit conditions are conditions that limit emissions and which permit provisions provide MRRR for those emissions limits.</p> <p>Condition 3.7 of the permit, which requires the use of a Ventri-Rod Scrubber and multiclone to control particulate emissions, appears to require "gap-filling" as it does not appear to have related MRRR. BAF suggests that this be addressed by including inspection of the Ventri-rod scrubber and multiclone in the Kipper Boiler annual inspection and maintenance required under Permit Condition 3.9.</p>	<p>It appears to BAF that many of the permit conditions listed as MRRR for the Kipper Boiler are actually emission limits that have their own related MRRR. This is because operating limits (such as limits on fuel usage or steam production) or work practice standards (such as boiler tuneup requirements) are implemented specifically as surrogates for numeric emissions limits. As such they are enforceable as emissions limits and have their own attendant MRRR.</p>
<p>57. Page 18++; discussion of Emissions-Unit Specific Emissions Limits for Kipper Boiler</p>	<p>None currently</p>	<p>Add discussion to the Statement of Basis regarding applicability of 40 CFR 241 and interaction with 40 CFR 63 Subpart JJJJU. This would be in support of the added permit conditions requested by BAF regarding combustion of fuels that are determined to not be solid waste in accordance with 40 CFR 241. See Attachment 1 to these comments for BAF's overview of the information that needs to be included.</p>	<p>As noted in BAF's comment on the draft permit, this additional operating requirement is necessary to assure that the facility remains subject to 40 CFR 63 Subpart JJJJU and that 40 CFR 60 Subpart DDDD is inapplicable as long as the facility combusts materials that are determined to not be solid waste as provided in accordance with 40 CFR 241. The interplay among the components of the CISWI, boiler MACT, and NHSM rules is complex, and it is essential that Statement of Basis document applicability and inapplicability of the different components of the rules was established.</p>
<p>58. Page 25</p>	<p>Permit Condition 6.1 ... MRRR - (Permit Condition 6.5)</p>	<p>Permit Condition 6-1 <u>5.1</u> ... MRRR - (Permit Condition 6-5 <u>5.5</u>)</p>	<p>Formatting</p>

COMMENTS ON DRAFT SOB – Rexburg Facility of Basic American Foods

REFERENCE	EXISTING LANGUAGE	REQUESTED CHANGE	JUSTIFICATION
59. Page 33+; MACT Applicability (40 CFR 63)	Various	Much of the quoted regulatory language in this section should be updated to reflect the revisions to Subpart JJJJJ that we published in the Federal Register on February 1, 2013.	Synchs with the current version of the regulation.
60. Page 33+; MACT Applicability (40 CFR 63)	NA	Add discussion to the Statement of Basis regarding applicability of 40 CFR 241 and interaction with 40 CFR 63 Subpart JJJJJ. This would be in support of the added permit conditions requested by BAF regarding combustion of fuels that are determined to not be solid waste in accordance with 40 CFR 241. See Attachment 1 to these comments for BAF's overview of the information that needs to be included.	As a biomass boiler, the status of the Kipper Boiler with respect to the Boiler MACT, CISWI and NHSM rules is a paramount regulatory applicability issue. The interplay among the components of the CISWI, boiler MACT, and NHSM rules is complex, and it is essential that Statement of Basis document applicability and inapplicability of the different components of the rules was established.

Table 1. Correlations of Kipper Boiler Emissions Limits with Associated MRRR

Emission Limit, Operating Limit, or Work Practice	MRRR Provisions																				
	3.8	3.9	3.11	3.14	3.15	3.16	3.17	3.18	3.19	3.20	3.21	3.22	3.23	3.24	3.25	3.26	3.27	3.28	3.29	3.30	
3.1. PM-10 emission limit	X			X		X	X	X	X		X			X		X					
3.2. SO2 emissions limit	X			X	X																
3.3. Fuel Burning Equipment - PM				X		X	X	X	X		X			X		X					
3.4. Kipper Boiler Fuel Types	X			X											X						
3.5. Coal Requirements	X			X	X										X						
3.6. Steam Production				X																	
3.7. Ventri-Rod Scrubber and Multi-clone																					
3.9. Boiler annual inspection and maintenance		X																			
3.10. 6J Tune-up Requirement												X					X				X
3.11 6J One-Time Energy Assessment			X									X						X			X
3.12 6J Tune-up Deadline												X					X				X

Table 1. Correlations of Kipper Boiler Emissions Limits with Associated MRRR

Emission Limit, Operating Limit, or Work Practice	MRRR Provisions.																				
	3.8	3.9	3.11	3.14	3.15	3.16	3.17	3.18	3.19	3.20	3.21	3.22	3.23	3.24	3.25	3.26	3.27	3.28	3.29	3.30	
3.13. 6J One Time Energy Assessment Deadline												x						x			x
3.20 Quality Improvement Program											x										
new condition to be added regarding combustion of biomass																			x		x

ATTACHMENT 1
DISCUSSION OF APPLICABILITY OF BOILER MACT, CISWI AND NHSM RULES TO WOOD FUEL COMBUSTION IN THE KIPPER BOILER

BAF believes that a critical element in the regulatory analysis in the SOB is a clear statement of the status of the Kipper Boiler with respect to the Boiler MACT, CISWI, and NHSM rules. This package of rules was a major rule making by EPA, with significant implications for biomass boilers, which includes the Kipper Boiler.

The rule-making effort by EPA is detailed and complex. Because the Title V (Tier I) permitting process requires an analysis of applicable and inapplicable requirements, this Tier I permit renewal provides an appropriate framework for clarifying which sets of rules apply to the Kipper Boiler, with appropriate documentation of the basis for that decision making.

In BAF's "Application for Renewal of Tier I Air Operating Permit, Rexburg Facility of Basic American Foods", BAF stated that the only wood fuels that would be combusted in the Kipper Boiler would be materials comply with the requirements of 40 CFR 241 to not be classed as solid waste. This is reflected in the discussion of Applicable Regulatory Requirements (Section 3 of the Application) and the identification of Inapplicable Rules and Requirements (Section 4 of the Application). These considerations are also developed in the Regulatory Analysis of Applicable Rules and Requirements in Appendix D of the Application.

If the conditions of the draft permit are appropriately updated to reflect the amendments to 40 CFR 241 and 40 CFR 63 Subpart JJJJJJ enacted in January and February 2013, the permit will contain appropriate conditions to implement. However, while the language of the permit might suffice on its face, the technical review of permit conditions in the Statement of Basis is a critical adjunct to the permit conditions, as this is the document which establishes the rationale underlying the permit conditions. Given the complexity of the Boiler MACT/CISWI/ NHSM rule making packages BAF believes the SOB needs to contain a full and complete discussion of the interaction of these regulatory components and the rationale by which applicable provisions are identified and carried forward into the permit.

The discussion below identifies in bullet point discussion format salient components of the regulatory analysis that BAF believes need to be integrated into the Statement of Basis as appropriate, and BAF requests that this discussion be incorporated into the SOB in the appropriate locations.

- Per 40 CFR 60 Subpart DDDD, § 60.2875 a CISWI unit is:
... any distinct operating unit of any commercial or industrial facility that combusts, or has combusted in the preceding 6 months, any solid waste as that term is defined in 40 CFR part 241. If the operating unit burns materials other than traditional fuels as defined in § 241.2 that have been discarded, and you do not keep and produce records as required by § 60.2740(u), the operating unit is a CISWI unit.
- In contrast per 40 CFR 63 Subpart JJJJJJ, §63.11200 one of the subcategories of boilers regulated under Subpart JJJJJJ is "biomass". Per §63.11237 of Subpart JJJJJJ "the biomass subcategory includes any boiler that burns any biomass and is not in the coal subcategory". This section further defines "biomass" to be:

any biomass-based solid fuel that is not a solid waste. This includes, but is not limited to, wood residue and wood products (e.g., trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings, and shavings); animal manure, including litter and other bedding materials; vegetative agricultural and silvicultural materials, such as logging residues (slash), nut and grain hulls and chaff (e.g., almond, walnut, peanut, rice, and wheat), bagasse, orchard prunings, corn stalks, coffee bean hulls and grounds.

- With these definitions it is clear that the Kipper Boiler will fall under one or the other of 40 CFR 60 Subpart DDD or 40 CFR 63 Subpart JJJJJ, and the determination will turn on whether or not the wood fuels combusted in the Kipper are solid waste.
- The basis for determining whether biomass materials combusted in a boiler are solid waste is set forth in 40 CFR 241. Categories of materials that are applicable to the Kipper Boiler and that are not solid waste per 40 CFR 241 are discussed below.

– *Clean Cellulosic Biomass*

As defined in 40 CFR 241.2,

Clean cellulosic biomass means those residuals that are akin to traditional cellulosic biomass, including, but not limited to: Agricultural and forestderived biomass (e.g., green wood, forest thinnings, clean and unadulterated bark, sawdust, trim, tree harvesting residuals from logging and sawmill materials, hogged fuel, wood pellets, untreated wood pallets); urban wood (e.g., tree trimmings, stumps, and related forestderived biomass from urban settings); corn stover and other biomass crops used specifically for the production of cellulosic biofuels (e.g., energy cane, other fast growing grasses, byproducts of ethanol natural fermentation processes); bagasse and other crop residues (e.g., peanut shells, vines, orchard trees, hulls, seeds, spent grains, cotton byproducts, corn and peanut production residues, rice milling and grain elevator operation residues); wood collected from forest fire clearance activities, trees and clean wood found in disaster debris, clean biomass from land clearing operations, and clean construction and demolition wood. These fuels are not secondary materials or solid wastes unless discarded. Clean biomass is biomass that does not contain contaminants at concentrations not normally associated with virgin biomass materials.

This category includes a variety of materials that BAF buys directly from producers of these materials. These materials are recognized by the producers and suppliers as commercially valuable products and are managed as such. At no point are these materials discarded, and BAF purchases these materials at prices that recognize the commercial value of these materials.

- Fuel that are produced from the processing of discarded non-hazardous secondary materials and that meet the “legitimacy criteria” of 40 CFR 241(d)(1).

Processing is defined in 40 CFR 241.2 to include “any operations that transform discarded non-hazardous secondary material into a non-waste fuel”.

For the Kipper Boiler these materials are chipped or hogged clean wood that is salvaged from construction debris sourced from landfills. Fuel suppliers process the construction debris by separating clean wood from the debris.

The regulatory status of these materials is set forth at 40 CFR 241(b):

(b) The following non-hazardous secondary materials are not solid wastes when combusted:

...

(4) Fuel or ingredient products that are used in a combustion unit, and are produced from the processing of discarded non-hazardous secondary materials and that meet the legitimacy criteria specified in paragraph (d)(1) of this section, with respect to fuels, and paragraph (d)(2) of this section, with respect to ingredients. The legitimacy criteria apply after the non-hazardous secondary material is processed to produce a fuel or ingredient product. ...

40 CFR 63.11225(c)(ii) establishes record-keeping requirements that are applicable when combusting materials that are determined to not be solid wastes in accordance with 40 CFR 241.3:

... if you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to § 241.3(b)(4) of this chapter, you must keep records as to how the operations that produced the fuel satisfies the definition of processing in § 241.2 and each of the legitimacy criteria in § 241.3(d)(1) of this chapter. If the fuel received a non-waste determination pursuant to the petition process submitted under § 241.3(c) of this chapter, you must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust nonhazardous secondary materials as fuel per § 241.4, you must keep records documenting that the material is a listed non-waste under § 241.4(a).

- As long as the wood combusted in the Kipper Boiler is sourced and managed to comply with the requirements of 40 CFR 241 and 40 CFR 63 Subpart JJJJJJ pertaining to non-solid waste materials, the Kipper Boiler will be classed as a biomass subcategory boiler regulated under 40 CFR 63 Subpart JJJJJJ and not a CISWI unit regulated by 40 CFR 60 Subpart DDDD.
- If BAF should cease to operate the Kipper Boiler in accordance with these provisions, the Kipper Boiler will become a CISWI unit regulated under 40 CFR Subpart DDDD.

Comments were received from the facility on March 13, 2013. A copy of these comments is included in this appendix. The responses to the comments are as follows:

DEQ Response to No. 1:

TOC updated.

DEQ Response to No. 2:

Correction made.

DEQ Response to No. 3:

Correction made.

DEQ Response to No. 4:

Added statement: The sources that have been listed as insignificant in accordance with IDAPA 58.01.01.317 are not listed in this table.

The 10% significance threshold refers to permit to construct requirements. The Tier I insignificant list is a different regulation.

DEQ Response to No. 5:

The sources that are listed as insignificant were removed from the list in the permit of regulated sources.

DEQ Response to No. 6:

Corrected.

DEQ Response to No. 7:

The permit condition language states that the permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A—"General Provisions"—in accordance with 40 CFR 60.1. If the standard is determined to be not applicable to a source, then the permittee is not required to meet those standards. This permit condition has been approved for use in all Title V permits by the EPA.

DEQ Response to No. 8:

The permit condition language states that the permittee shall comply with the requirements of 40 CFR 63, Subpart A – General Provisions, and that a summary of applicable requirements for affected sources is provided in Table 2.3. If a source is determined to not be subject to any of the provisions in any subpart of 40 CFR 63, then the permittee is not required to meet those standards. This permit condition has been approved for use in all Title V permits by the EPA.

DEQ Response to No. 9:

The changes have been made because they correct permit conditions.

DEQ Response to No. 10:

Quotes from 40 CFR 63 Subpart JJJJJ are incorporated into this permit, which references Section 241, which is a solid waste regulation. The language in Section 241 is not in the permit because it is not an air regulation. The permit condition that addresses incorporation of federal requirements by reference applies to a permit condition that incorporates the language of air federal requirements.

DEQ Response to No. 11:

The first part of the language in the comment was included in the permit and statement of basis. The second part of the second paragraph is explained more fully in this section of the statement of basis.

DEQ Response to No. 12:

Has been incorporated as requested.

DEQ Response to No. 13:

This has been fixed.

DEQ Response to No. 14:

This is not a direct quote from the regulation, but summarizes part of it, so the requested permit condition has been included.

DEQ Response to No. 15:

Clarification made.

DEQ Response to No. 16:

Updated.

DEQ Response to No. 17:

Change has been made.

DEQ Response to No. 18:

The citation is usually done for the most direct quote of the regulation.

DEQ Response to No. 19:

It now references Table 2. All the requirements are in that table.

DEQ Response to No. 20:

Making this change makes it so that the permit condition is less of an exact quote of the regulation, but it does not appear to change the meaning, so the change was made as requested.

DEQ Response to No. 21:

The citation is usually done for the most direct quote of the regulation.

DEQ Response to No. 22:

This clarification was made.

DEQ Response to No. 23:

Permit Condition 3.17 references 40 CFR 64.7. This regulation is as follows:

(a) Commencement of operation. The owner or operator shall conduct the monitoring required under this part upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to § 64.6(d).

A later date is not specified in the permit. The regulation requires monitoring to be done upon issuance of a Tier I operating permit that includes this monitoring, so the monitoring would be started at the issuance of the first Tier I operating permit that included CAM monitoring. The current permit action is a renewal of the preceding permit. The permit condition references the most recent Tier I operating permit. This regulation applies to the time period and the permit conditions covered under the previous permit as well as to this most recent renewal of the permit.

DEQ Response to No. 24:

Updates were made to incorporate the new regulation.

DEQ Response to No. 25:

Updates were made to incorporate the new regulation.

DEQ Response to No. 26:

The permit conditions are written to incorporate the regulation as closely as possible as it applies to the facility. The beginning of the permit condition now specifies that the whole permit condition applies to the Kipper boiler and not to the other boilers.

DEQ Response to No. 27:

Updates were made to incorporate the new regulation.

DEQ Response to No. 28:

Updates were made to incorporate the new regulation.

DEQ Response to No. 29:

Updates were made to incorporate the new regulation.

DEQ Response to No. 30:

Correction made.

DEQ Response to No. 31:

Permit condition has been updated per revised rule.

DEQ Response to No. 32:

The permit conditions are based on different parts of the rule.

DEQ Response to No. 33:

The permit condition has been updated to the latest version of the rule.

DEQ Response to No. 34:

The permit condition has been updated to the latest version of the rule.

DEQ Response to No. 35:

This permit condition is no longer applicable according to the most recent version of the rule, so it was removed. It may be applicable at a later date if fuel switching is done, but it is not applicable with this permitting action.

DEQ Response to No. 36:

This initial notification requirement has been removed.

DEQ Response to No. 37:

These three have been deleted. They are in the insignificant activities list.

DEQ Response to No. 38:

These have been deleted. They are in the insignificant activities list.

DEQ Response to No. 39:

The sentence has been deleted.

DEQ Response to No. 40:

Formatting error fixed.

DEQ Response to No. 41:

Formatting error fixed.

DEQ Response to No. 42:

These corrections have been made.

DEQ Response to No. 43:

The revision to the paragraph has been made.

DEQ Response to No. 44:

Deleted. This is outdated information.

DEQ Response to No. 45:

Correction made.

DEQ Response to No. 46:

Changed to "non-insignificant" sources.

DEQ Response to No. 47:

These have been deleted.

DEQ Response to No. 48:

Changed to "non-insignificant" sources.

DEQ Response to No. 49:

These have been deleted.

DEQ Response to No. 50:

Clarification paragraph added.

DEQ Response to No. 51:

Entry deleted.

DEQ Response to No. 52:

This request was partially accommodated. The second part of the request states that the applicability of the general provisions will be as set forth in those other portions of 40 CFR 60. Subpart Dc does not specifically reference every part of Subpart A that applies. The newer subparts go through each general provision and identify which ones are applicable. Subpart Dc does not do this.

DEQ Response to No. 53:

In this case, since the applicable subpart is a newer regulation, the regulation includes a listing of each part of the general provisions that apply, so the entire comment could be incorporated.

DEQ Response to No. 54:

This change has been made.

DEQ Response to No. 55:

This change was made as requested.

DEQ Response to No. 56:

The statement of basis was rewritten to incorporate these changes.

DEQ Response to No. 57:

Section added.

DEQ Response to No. 58:

This numbering correction has been made.

DEQ Response to No. 59:

Permit Conditions have been updated.

DEQ Response to No. 60:

Section added.