



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, ID 83706 • (208) 373-0502
www.deq.idaho.gov

Brad Little, Governor
Jess Byrne, Director

September 21, 2020

Kiel Burmester, Assistant Public Works Director
Fort Hall Mine Road Landfill
1500 N. Fort Hall Mine Road St.
Pocatello, ID 83204

RE: Facility ID No. 005-00062, Fort Hall Mine Road Landfill, Pocatello
Final Permit Letter

Dear Mr. Burmester:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2009.0146 Project 62411 to Fort Hall Mine Road Landfill located at Pocatello for the PTC Modification to increase permitted emissions. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received March 17, 2020.

This permit is effective immediately and replaces PTC No. P-2009.0146 issued on October 22, 2018. This permit does not release Fort Hall Mine Road Landfill from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

This PTC was processed in accordance with IDAPA 58.01.01.209.05.c. In accordance with IDAPA 58.01.01.381.03.b, so long as the change does not violate any terms or conditions of the existing Tier I permit, you may operate the source described in the PTC immediately upon submittal of your request for a Tier I administrative amendment.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Pocatello Regional Office, 444 Hospital Way #300, Fax (208) 236-6168.

In order to fully understand the compliance requirements of this permit, as requested, Melissa Gibbs, Regional Air Quality Manager, at (208) 236-6160, will schedule a permit handoff meeting to review and discuss the terms and conditions of this permit. Please note that this meeting should be scheduled once the permitted emissions units are operating and some representative records required by the permit have been generated by the facility. DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Mr. Burmester
September 21, 2020
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Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Zach Pierce at (208) 373-0502 or zach.pierce@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script that reads "Mike Simon".

Mike Simon
Stationary Source Bureau Chief
Air Quality Division

MS\zp

Permit No. P-2009.0146 PROJ 62411

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Fort Hall Mine Road Landfill
Permit Number P-2009.0146
Project ID 62411
Facility ID 005-00062
Facility Location 1500 N. Fort Hall Mine Rd.
Pocatello, ID 83204

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued September 21, 2020



Zach Pierce, Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a modified permit to construct (PTC) to increase permitted emissions from the two IC engines based upon updated manufacturer's emissions data.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2009.0146 issued on October 22, 2018.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	<u>Landfill:</u> Closed Cell 1 "Old Landfill", Cell 2 "Site A", and Cell 4	Landfill Gas (LFG) Collection System w/ the gas routed to an IC Engine(s) and/or a Flare
3	<u>IC Engine #1:</u> Manufacturer: Caterpillar Model: 3520C Manufacture Date: 2013 Maximum Power Rating: 2,242 bhp Fuel: Landfill gas	N/A
	<u>IC Engine #2:</u> Manufacturer: Caterpillar Model: 3520C Manufacture Date: 2018 or later Maximum Power Rating: 2,242 bhp Fuel: Landfill gas	N/A
	<u>Flare:</u> Maximum Rating: 15.92 MMBtu/hr Fuel: Landfill gas	N/A

[10/22/2018]

2 Landfill

2.1 Process Description

The landfill currently consists of two active cells, Cell 2 “Site A” and Cell 4. The original cell (Closed Cell 1, with a calculated capacity of 1,505,097 Mg, 1943 – 1993), was succeeded by Cell 2 (with a calculated capacity of 1,160,000 Mg, 1994 – 2022 or later (estimated)). A third cell, Cell 4, began operations in 2016, and has increased the total landfill design capacity to 8,057,896 US tons (7,310,000 Mg). The gas generated by the landfill is collected in a landfill gas (LFG) collection system and routed to two IC engines and a flare. Under primary operation, all landfill gas is combusted by the IC Engines with the flare serving as a backup combustion source when IC Engines are offline. The flare is capable of combusting all generated landfill gas on its own.

[10/22/2018]

2.2 Control Device Descriptions

Table 2.1 Landfill Description

Emissions Units / Processes	Control Devices	Emission Points
Closed Cell 1 Active 1943-1993 1,505,097 Mg	IC Engines and/or Flare	N/A (all LFG is routed to the IC engine(s) and flare)
Cell 2 Active 1994-2022 or later (estimated) 1,160,000 Mg		
Cell 4 Active 2011-2031 (estimated) Total permitted design capacity for all cells: 7,310,000 Mg		

[10/22/2018]

Operating Requirements

Reserved (The Tier I operating permit contains the permit conditions that apply to the landfill.)

3 IC Engines and Flare

3.1 Process Description

Collected LFG will be piped to the 2 lean-burn IC engines powering an electrical generator(s) that is connected to the commercial power grid. When the IC engines are off line or in the event of excess LFG, the gas is routed to the flare.

[10/22/2018]

3.2 Control Device Descriptions

Table 3.1 IC Engines and Flare Description

Emissions Units / Processes	Control Devices	Emission Points
Flare	N/A	Flare, F1
IC Engine #1	N/A	IC Engine exhaust, E1
IC Engine #2	N/A	IC Engine exhaust, E2

[10/22/2018]

Emission Limits

3.3 Emission Limits

The emissions from the IC engine and flare stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 IC Engine and Flare Emission Limits ^(a)

Source Description	PM ₁₀ ^(b)		SO ₂ ^(e)		NO _x		CO		VOC		Formaldehyde
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	T/yr ^(d)
Flare	0.19	0.81	3.28	14.36	0.58	2.52	0.67	2.93	0.19	0.83	17.64
IC Engine #1	0.24	1.07			5.47	23.98	22.01	96.39	3.07	13.44	
IC Engine #2	0.24	1.07			5.47	23.98	22.01	96.39	3.07	13.44	

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.
- e Compliance with SO₂ to be completed by confirming the TRS levels remain below 300 ppmv.

[9/21/2020]

3.4 NSPS 40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

In accordance with 40 CFR 60.4233(e) and Table 1 of 40 CFR 60, Subpart JJJJ, the permittee shall comply with the following emission standards for IC engines firing on landfill/digester gas (except lean burn 500 ≤ BHP ≤ 1,350):

Table 3.3 - 40 CFR 60, SUBPART JJJJ, TABLE 1 SUMMARY

Engine Type and Fuel	Maximum Engine Horsepower (bhp)	Manufacture Date	Emission Standards ¹					
			g/bhp-hr			ppmvd at 15% O ₂		
			NO _x	CO	VOC ²	NO _x	CO	VOC ²
Landfill/Digester Gas Fired (except lean burn 500 ≤ BHP ≤ 1,350)	BHP ≥ 500	After 7/1/2010	2.0	5.0	1.0	150	610	80

- ¹ Owners and operators of stationary non-certified spark ignited IC engines may choose to comply with the emissions standards in units of either g/bhp-hr or ppmvd at 15% O₂.
- ² When calculating emissions of volatile organic compounds, emissions of formaldehyde should not be included.

[1/7/2016]

Operating Requirements

Reserved (The Tier I operating permit contains the permit conditions that apply to the IC engine and flare.)

4 General Provisions

General Compliance

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

[Idaho Code §39-101, et seq.]

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

[IDAPA 58.01.01.211, 5/1/94]

4.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

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

- Enter upon the permittee’s premises where an emissions source is located, 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]

Construction and Operation Notification

4.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

4.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and

- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

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

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

4.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

Monitoring and Recordkeeping

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

Excess Emissions

- 4.11** The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

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

[IDAPA 58.01.01.123, 5/1/94]

False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

Transferability

- 4.15** This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

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

[IDAPA 58.01.01.211, 5/1/94]