



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
John H. Tippetts, Director

April 11, 2017

Dee Hodge, Responsible Official
Burley City of (City of Burley IWTP)
401 Hiland Ave.
Burley, ID 83318

RE: Facility ID No. 067-00022, Burley City of (City of Burley IWTP), Burley
Final Permit Letter

Dear Mr. Hodge:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2016.0037 Project 61740 to City of Burley (City of Burley IWTP) located at Burley for adding new dischargers to the anaerobic digester. 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 June 24, 2016.

This permit is effective immediately and replaces Permit to Construct No. P-040412, issued on January 6, 2006. This permit does not release City of Burley (City of Burley IWTP) from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

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 Twin Falls Regional Office, 650 Addison Avenue West, Suite 110, Twin Falls, ID 83301, Fax (208) 736-2194.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Air and Remediation Regional Manager, at (208) 736-2190 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, 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.

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 Shawnee Chen at (208) 373-0502 or Shawnee.chen@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon". The signature is written in a cursive style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\syc

Permit No. P-2016.0037 PROJ 61740

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Burley City of (City of Burley IWTP)
Permit Number P-2016.0037
Project ID 61740
Facility ID 067-00022
Facility Location 999 West Railroad Ave
Burley, ID 83318

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 April 11, 2017



Shawnee Chen, P.E., Permit Writer



Mike Simon, Stationary Source Manager

Contents

1 Permit Scope..... 3

2 ADI-BVF Anaerobic Digester Flare..... 4

3 General Provisions..... 8

1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) for allowing new dischargers to the ADI - Bulk Volume Fermenter (BVF) anaerobic digester. [4/11/2017]
- 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-040412, issued on January 6, 2006. [4/11/2017]

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>ADI-BVF Anaerobic Digester Flare</u> The ADI-BVF anaerobic digester is where wastewater is retained and acted upon by bacteria. Biogas byproducts (CH ₄ CO ₂ , and H ₂ S) collected from under the cover of the digester are burned in a flare system. The facility has one flare.	None

[4/11/2017]

2 ADI-BVF Anaerobic Digester Flare

2.1 Process Description

Pretreated wastewater from dischargers is retained and biologically degraded in the ADI-BVF anaerobic digester. The biogas byproducts created include methane (CH₄), carbon dioxide (CO₂), and less than 1% hydrogen sulfide (H₂S). Biogas byproducts are collected from under the cover of the digester and burned by the flare system. The flare system consists of one flare. The criteria pollutants emitted from the biogas flare are PM₁₀, SO₂, CO, NO_x and VOC.

2.2 Control Device Descriptions

The emissions from the flare are uncontrolled.

Emission Limits

2.3 Visible Emissions Limit

The permittee shall not discharge any air pollutant into 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 required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.4 Particulate Matter Emissions Limits for Incinerators

Particulate matter emissions from the flare shall not exceed 0.2 pounds per 100 pounds of biogas combusted, in accordance with IDAPA 58.01.01.786.

[4/11/2017]

2.5 Sulfur Dioxide Emissions Limit

The sulfur dioxide emissions from the ADI-BVF digester flare stack shall not exceed 99 tons per any consecutive 12-month period (T/yr).

[4/11/2017]

2.6 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 as required in IDAPA 58.01.01.775-776.

Operating Requirements

2.7 Pilot Flame

The ADI-BVF digester flare system shall be operated with a pilot flame present at all times while receiving off-gasses due to the operation of the digester. In the event of the pilot flame-out, the permittee shall follow a standard operating procedure to re-ignite the pilot flame as expeditiously as practicable. No biogas shall be sent to the flare system while the pilot flame is out. The permittee shall notify DEQ within 24 hours of a pilot flame-out. The permittee shall maintain records onsite of the time and duration of all pilot flame-out periods. A copy of standard operating procedure shall be kept on site and shall be made available to DEQ representatives upon request.

2.8 Odor Complaints

The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.9 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

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

2.10 Flare Throughput Limit

The flare shall not burn more than 105,000,000 standard cubic feet of biogas during any consecutive 12-month period.

[4/11/2017]

Monitoring and Recordkeeping Requirements

2.11 Flare Pilot Flame Monitoring

The permittee shall have installed and maintained and operated a thermocouple or similar device that detects the presence of a pilot flame in the biogas flare system.

2.12 Flare Throughput Monitoring

The permittee shall monitor and record the biogas flowrate to the flare monthly. The permittee shall sum the monthly biogas flowrate to the previous consecutive 11-month biogas flowrate to demonstrate compliance with Flare Throughput Limit.

[4/11/2017]

2.13 Maintaining Dischargers List

The permittee shall maintain a list of dischargers on-site and make it available to DEQ on request. The list shall contain the date each discharger begin discharging pre-treated wastewater to the digester.

[4/11/2017]

Performance Testing Requirements

2.14 Performance Test

- 2.14.1 Whenever a new discharger begins to discharge its pre-treated wastewater to the ADI-BVF anaerobic digester, the permittee shall conduct a performance test in accordance with the requirements set forth in IDAPA 58.01.01.157 and Permit Conditions 2.14.2 and 2.14.3 to estimate SO₂ emissions from the ADI-BVF anaerobic digester to demonstrate compliance with Permit Condition 2.5. The applicant shall estimate SO₂ emissions from the digester flare by assuming that 80% of H₂S from the digester is oxidized and combusted to form SO₂. The emissions rate of H₂S from the digester in pound per hour shall be estimated. The details on which parameters will be measured and how H₂S emissions from the digester in pound per hour are calculated shall be provided in the performance test protocol required in Permit Condition 2.14.3.
- 2.14.2 Each performance test shall be conducted within 60 days after a new discharger achieves its maximum production rate, but not later than 180 days after initial startup of the new discharger unless an extension is granted by DEQ. At no time shall testing exceed 365 days after initial startup of the new discharger.
- 2.14.3 Prior to conducting any performance test, the permittee shall 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

The permittee shall submit a compliance test report for the respective test to DEQ within 60 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office
650 Addison Avenue West, Suite 110
Twin Falls, Idaho 83301
Phone: (208) 736-2190 Fax: (208) 736-2194

[4/11/2017]

2.15 Monitoring Requirements Re-evaluation

The permittee shall contact DEQ and submit information to DEQ to re-evaluate the monitoring requirements within 60 days when the performance test shows that the SO₂ emissions rate is equal to or greater than 90 tons per year or 90% of the major source threshold of 100 tons per year. The monitoring requirements in this PTC shall be revised as needed.

[4/11/2017]

2.16 O&M Manual

The permittee shall have developed an O&M manual in accordance with manufacturer specifications for the flare system. The flare system shall be operated in accordance with manufacturer and O&M manual specifications. The O&M manual shall address the operation, maintenance, and repair of the flare system and shall include at a minimum, the following: a general description, normal operating conditions (including operating ranges for the parameters) and procedures, methods of preventing malfunctions, appropriate corrective actions to be taken, and provisions for quarterly inspections. The normal operating conditions, including operating ranges for the parameters, and procedures in the O&M manual may be revised based on most recent source test data. The O&M manual shall be maintained on site at all times and shall be made available to DEQ representatives upon request.

[4/11/2017]

Notification

2.17 New Discharger Notification

Within five working days after occurrence, the permittee shall notify DEQ each time a new discharger begins to discharge to the digester.

[4/11/2017]

3 General Provisions

General Compliance

3.1 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.]

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

[IDAPA 58.01.01.211, 5/1/94]

3.3 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

3.4 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

3.5 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]

3.6 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;
- 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; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7** 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.
- 3.8** 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.
- 3.9** 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 written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

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

Monitoring and Recordkeeping

- 3.10** 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

- 3.11 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

- 3.12 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

- 3.13 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

- 3.14 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

- 3.15 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

- 3.16 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]