STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Governor Brad Little
Director John H. Tippets

November 1, 2019

Daniel Hall
Director of Operations
P. Kay Metal Inc.
2448 East 25th Street
Los Angeles, CA 90058

RE: Facility ID No. 069-00071, P. Kay Metal Lewiston LLC
Final permit letter, DEQ-initiated permit reissuance

Dear Mr. Hall:

The Department of Environmental Quality (DEQ) is reissuing Permit to Construct (PTC) No. P-2017.0013 Project 62327 to P. Kay Metal Lewiston LLC to list the new production limit (in Permit Condition 2.10) established during performance testing required by the previously issued permit, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is effective immediately and replaces PTC No. P-2017.0013, issued on August 4, 2017. This permit does not release P. Kay Metal Lewiston LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. The accompanying Statement of Basis document remains unchanged.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Melissa Rhein, Air Quality Analyst, at (208) 799-4370 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 Morrie Lewis at (208) 373-0502 or Morrie.Lewis@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/ml

Permit No. P-2017.0013 Project 62327

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	P. Kay Metal Lewiston LLC
Permit Number	P-2017.0013
Project ID	62327
Facility ID	069-00071
Facility Location	152 Southport Avenue Lewiston, Idaho 83501

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 November 1, 2019

Morrie Lewis, Permit Writer

Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is a revised permit to construct (PTC) to reduce production limits (Permit Condition 2.10) consistent with those achieved during performance testing, in accordance with IDAPA 58.01.01.157.02.

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-2017.0013, issued on August 4, 2017.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Tilting Rotary Furnace (Kettle 1) Manufacturer: Eclipse RatioMatic Model: RM0700 Maximum capacity: 53,000 lb loading capacity Maximum operation: 60 T/day product and as limited facility-wide Maximum process temperature: 930°C Burner fuel: natural gas Burner fuel consumption: 7.0 MMBtu/hr and as limited facility-wide	Rotary Furnace Baghouse Manufacturer: Scientific Dust Collectors Model: SPJ-688-4T10 $PM_{2.5}$ Control Efficiency: 99% or greater
2	Refining Kettle and Burner (Kettle 2) Manufacturer/model: P. Kay Metal Lewiston LLC Maximum capacity: 100,000 lb loading capacity Maximum operation: 144 T/day product and as limited facility-wide Maximum process temperature: 486°C Burner manufacturer: Eclipse Ratio Air Burners Burner model: RA0300 Burner fuel: natural gas Burner fuel consumption: 3.0 MMBtu/hr and as limited facility-wide	
2	Refining Kettle and Burner (Kettle 3) Manufacturer/model: P. Kay Metal Lewiston LLC Maximum capacity: 100,000 lb loading capacity Maximum operation: 144 T/day product and as limited facility-wide Maximum process temperature: 486°C Burner manufacturer: Eclipse Ratio Air Burners Burner model: RA0300 Burner fuel: natural gas Burner fuel consumption: 3.0 MMBtu/hr and as limited facility-wide	

Table 1.1 (continued)

Permit Section	Source	Control Equipment
2	Alloying Kettle and Burner (Kettle 4) Manufacturer/model: P. Kay Metal Lewiston LLC Maximum capacity: 200,000 lb loading capacity Maximum operation: 240 T/day product and as limited facility-wide Maximum process temperature: 486°C Burner manufacturer: Eclipse Ratio Air Burners Burner model: RA0500 Burner fuel: natural gas Burner fuel consumption: 4.0 MMBtu/hr and as limited facility-wide	Holding Kettle Room Baghouse Manufacturer: Scientific Dust Collectors Model: SPJ-512-4T10 $PM_{2.5}$ Control Efficiency: 99% or greater
2	Alloying Kettle and Burner (Kettle 5) Manufacturer/model: P. Kay Metal Lewiston LLC Maximum capacity: 200,000 lb loading capacity Maximum operation: 240 T/day product and as limited facility-wide Maximum process temperature: 486°C Burner manufacturer: Eclipse Ratio Air Burners Burner model: RA0500 Burner fuel: natural gas Burner fuel consumption: 4.0 MMBtu/hr and as limited facility-wide	
2	Holding Kettle and Burner (Kettle 6) Manufacturer/model: P. Kay Metal Lewiston LLC Maximum capacity: 100,000 lb loading capacity Maximum operation: 38.4 T/day product and as limited facility-wide Maximum process temperature: 486°C Burner manufacturer: Eclipse Ratio Air Burners Burner model: RA0200 Burner fuel: natural gas Burner fuel consumption: 2.0 MMBtu/hr and as limited facility-wide	
2	Holding Kettle and Burner (Kettle 7) Manufacturer/model: P. Kay Metal Lewiston LLC Maximum capacity: 100,000 lb loading capacity Maximum operation: 72 T/day product and as limited facility-wide Maximum process temperature: 486°C Burner manufacturer: Eclipse Ratio Air Burners Burner model: RA0300 Burner fuel: natural gas Burner fuel consumption: 3.0 MMBtu/hr and as limited facility-wide	

Table 1.1 (continued)

Permit Section	Source	Control Equipment
2	Holding Kettle and Burner (Kettle 8) Manufacturer/model: P. Kay Metal Lewiston LLC Maximum capacity: 100,000 lb loading capacity Maximum operation: 90 T/day product and as limited facility-wide Maximum process temperature: 486°C Burner manufacturer: Eclipse Ratio Air Burners Burner model: RA0300 Burner fuel: natural gas Burner fuel consumption: 3.0 MMBtu/hr and as limited facility-wide	Holding Kettle Room Baghouse Manufacturer: Scientific Dust Collectors Model: SPJ-512-4T10 $PM_{2.5}$ Control Efficiency: 99% or greater
2	Holding Kettle and Burner (Kettle 9) Manufacturer/model: P. Kay Metal Lewiston LLC Maximum capacity: 50,000 lb loading capacity Maximum operation: 90 T/day product and as limited facility-wide Maximum process temperature: 486°C Burner manufacturer: Eclipse Ratio Air Burners Burner model: RA0300 Burner fuel: natural gas Burner fuel consumption: 3.0 MMBtu/hr and as limited facility-wide	
2	Holding Kettle and Burner (Kettle 10) Manufacturer/model: P. Kay Metal Lewiston LLC Maximum capacity: 12,000 lb loading capacity Maximum operation: 6 T/day product and as limited facility-wide Maximum process temperature: 486°C Burner manufacturer: Eclipse Ratio Air Burners Burner model: RA0100 Burner fuel: natural gas Burner fuel consumption: 0.5 MMBtu/hr and as limited facility-wide	
2	Holding Kettle and Burner (Kettle 11) Manufacturer/model: P. Kay Metal Lewiston LLC Maximum capacity: 12,000 lb loading capacity Maximum operation: 6 T/day product and as limited facility-wide Maximum process temperature: 486°C Burner manufacturer: Eclipse Ratio Air Burners Burner model: RA0100 Burner fuel: natural gas Burner fuel consumption: 0.5 MMBtu/hr and as limited facility-wide	
2	Holding Kettle and Burner (Kettle 12) Manufacturer/model: P. Kay Metal Lewiston LLC Maximum capacity: 2,000 lb loading capacity Maximum operation: 1.2 T/day product and as limited facility-wide Maximum process temperature: 486°C Burner manufacturer: Eclipse Ratio Air Burners Burner model: RA075 Burner fuel: natural gas Burner fuel consumption: 0.75 MMBtu/hr and as limited facility-wide	

Table 1.1 (continued)

Permit Section	Source	Control Equipment
2	Fugitive emissions	Reasonable control of fugitive emissions, and Fugitive Baghouse (for kettle room emissions) Manufacturer: Scientific Dust Collectors Model: SL4-40 $PM_{2.5}$ Control Efficiency: 99% or greater

2 Kettle Rooms

2.1 Process Description

P. Kay Metal Lewiston LLC is a supplier of an assortment of metals as well as a metal recycling company. P. Kay Metal Lewiston LLC manufactures premium solders and lead alloys in bar and wire form for the military and a wide variety of industries including electronics and ammunition industries. The process includes secondary lead processing, melting, extruding, and casting metal into billets, bars, and wires for solder.

2.2 Control Equipment Descriptions

Emissions from each kettle and from PM emission-generating activities conducted in the Refining & Holding Kettle Room and the Holding Kettle Room are controlled with baghouses.

Table 2.1 Control Equipment

Emissions Units / Processes	Control Equipment
Tilting Rotary Furnace (Kettle 1)	Rotary Furnace Baghouse
Refining Kettle and Burner (Kettle 2)	
Refining Kettle and Burner (Kettle 3)	
Alloying Kettle and Burner (Kettle 4)	Holding Kettle Room Baghouse
Alloying Kettle and Burner (Kettle 5)	
Holding Kettle and Burner (Kettle 6)	
Holding Kettle and Burner (Kettle 7)	
Holding Kettle and Burner (Kettle 8)	
Holding Kettle and Burner (Kettle 9)	
Holding Kettle and Burner (Kettle 10)	
Holding Kettle and Burner (Kettle 11)	
Holding Kettle and Burner (Kettle 12)	
Fugitive emissions	Fugitive Baghouse

Emission Limits

2.3 Emission Limits

The emissions from each baghouse shall not exceed any corresponding emission rate limit listed in Table 2.2.

Table 2.2 Baghouse Emission Limits [a]

Source	$PM_{2.5}$ [b]	Lead
	lb/hr [c]	lb/hr [c]
Rotary Furnace Baghouse stack	0.0053 [d]	0.0015 [d]
Holding Kettle Room Baghouse stack	0.010 [d]	0.0033 [d]
Fugitive Baghouse stack	0.0009 [d]	0.00028 [d]

a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.

b) Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers ($PM_{2.5}$), 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 method, or DEQ-approved alternative.

d) For this emission limit compliance may be demonstrated as measurement below detection limits, when addressed as part of a performance test protocol that is approved by DEQ.

2.4 NSPS 40 CFR 60, Subpart L – Tilting Rotary Furnace Standard for PM

In accordance with 40 CFR 60.122(a), on and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the permittee shall not discharge nor cause the discharge into the atmosphere from a blast (cupola) or reverberatory furnace any gases which:

- Contain particulate matter in excess of 50 mg/dscm (0.022 gr/dscf)
- Exhibit 20 percent opacity or greater

2.5 NSPS 40 CFR 60, Subpart L – Kettle Standard for PM

In accordance with 40 CFR 60.122(b), on and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, the permittee shall not discharge nor cause the discharge into the atmosphere from any pot furnace (Kettles 2–12) any gases which exhibit 10 percent opacity or greater.

2.6 Opacity Limit

Emissions from the Rotary Furnace Baghouse stack, the Holding Kettle Room Baghouse stack, and the Fugitive Baghouse stack, or any other stack, vent, or functionally-equivalent opening associated with the Tilting Rotary Furnace (Kettle 1), refining kettles (Kettles 2–3), alloying kettles (Kettles 4–5), and holding kettles (Kettles 6–12) shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.7 Fuel-Burning Equipment

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas in accordance with IDAPA 58.01.01.677.

2.8 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.

2.9 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776.

Operating Requirements

2.10 Production Limits

All refined materials shall be cast and extruded on site. The maximum amount of finished product produced from the kettles each calendar day (T/day) shall not exceed 226 tons – including billets, bars, and wires for solder.

[11/01/19]

2.11 Tilting Rotary Furnace Temperature Limit

Material processed in the Tilting Rotary Furnace (Kettle 1) shall not exceed a temperature of 930 degrees Celsius.

2.12 Baghouse Operation

The permittee shall install, maintain, and operate the Rotary Furnace Baghouse, the Holding Kettle Room Baghouse, and the Fugitive Baghouse in accordance with the Baghouse O&M Manual to control PM emissions from the Tilting Rotary Furnace (Kettle 1), refining kettles (Kettles 2–3), alloying kettles (Kettles 4–5), and holding kettles (Kettles 6–12). The permittee shall operate the baghouses at all times when the kettles are operating.

2.13 Fuel Limits

The Tilting Rotary Furnace (Kettle 1), refining kettle (Kettles 2–3), alloying kettle (Kettles 4–5), and holding kettle (Kettles 6–12) burners shall only combust natural gas fuel.

Monitoring and Recordkeeping Requirements

2.14 Fugitive Emission Monitoring

The permittee shall conduct weekly facility-wide inspections of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective.

- If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable.
- The permittee shall conduct a see/no see evaluation for each potential source of visible fugitive emissions. If any visible fugitive emissions are present from any source of fugitive emissions, the permittee shall take appropriate corrective action as expeditiously as practicable to mitigate the visible fugitive emissions.
- The permittee shall inspect enclosures and facility structures that contain any lead-bearing materials at least once per month. The permittee shall attempt to repair any gaps, breaks,

separations, leak points or other possible routes for emissions of lead or particulate matter to the atmosphere (i.e., from other than the baghouses) within one week of identification.

- The permittee shall maintain records of the results of each fugitive emission inspection. The records shall include, at a minimum, the date and results of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible fugitive emissions were present (if observed), the enclosures and facility structures inspected, any corrective action taken in response to the visible fugitive emissions, and the date the corrective action was taken.
- A compilation of the most recent five years of records shall be kept onsite and made available to DEQ representatives upon request.

2.15 Odor Complaint Monitoring

The permittee shall maintain records of all odor complaints received to demonstrate compliance with the Odors limit. 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.

2.16 Product Weight Monitor

The permittee shall install, calibrate, and maintain a device to monitor the weights of finished product. In the event a measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

2.17 Production Monitoring

Each calendar day that kettles are operated, the permittee shall monitor and record the weight of all finished product in tons per calendar day (T/day) to demonstrate compliance with facility-wide Production Limits. Any measurements used in calculating daily production (e.g., the weight of empty pallets), shall also be recorded. Records shall be maintained in accordance with the General Provisions of this permit.

2.18 Tilting Rotary Furnace Temperature Monitor

The permittee shall install, calibrate, maintain, and continuously operate a device to monitor and record the processing temperature of the Tilting Rotary Furnace (Kettle 1) in degrees Celsius, consistent with the requirements for continuous monitoring systems in 40 CFR 63.8, or as otherwise approved by DEQ. Process temperature shall be monitored and recorded at least once every 15 minutes of operation. In the event a measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. Records shall be maintained in accordance with the General Provisions of this permit.

- In conjunction with each performance test to determine compliance with $PM_{2.5}$ and lead Emission Limits, the permittee shall conduct a performance evaluation for the temperature monitoring device according to procedures of 40 CFR 63.8(e), or as otherwise approved by DEQ. The temperature monitoring device must meet the following performance and equipment specifications, unless otherwise approved by DEQ:

- If the temperature monitoring probe is to be located in the exhaust stream rather than within the rotary furnace shell or process chamber, exhaust stream temperature readings shall be correlated to the process temperature of the molten lead. Documentation of this temperature correlation and any associated calibration adjustment shall be maintained onsite.
- The recorder response range must include zero and 1.5 times the average temperature identified during the most recent performance test.
- The monitoring system calibration drift must not exceed 2 percent of 1.5 times the average temperature identified during the most recent performance test.
- The monitoring system relative accuracy must not exceed 5 percent.
- The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or an alternate reference, subject to the approval of DEQ.

- The temperature of the furnace exhaust streams shall be monitored every 15 minutes during the initial performance or compliance test and an hourly arithmetic average for the recorded temperature measurements determined.

2.19 Tilting Rotary Furnace Temperature Monitoring

The average temperature for each hour of operation shall be recorded and compared to the Tilting Rotary Furnace Temperature Limit. The average temperature shall be calculated as an arithmetic average of all temperatures measured and recorded during that hour (at least once every 15 minutes, as required in the Tilting Rotary Furnace Temperature Monitor condition.

- For any period of time that the average hourly Tilting Rotary Furnace process temperature exceeds the Tilting Rotary Furnace Temperature Limit, a report shall be sent to DEQ explaining the nature of the exceedance and evaluating any changes to applicability of NESHAP 40 CFR 63, Subpart X requirements. The report shall be completed as expeditiously as practicable, and submitted to the DEQ address provided in this permit no later than fifteen days after the date of the temperature exceedance.

2.20 Baghouse Leak Detection System

The bag leak detection system shall meet the following specification and requirements, unless otherwise approved by DEQ:

- The bag leak detection system sensor must provide output of relative particulate matter loadings.
- The bag leak detection system must be equipped with an alarm system that will alarm when an increase in relative particulate loadings is detected over a preset level.
- The bag leak detection system shall be installed and operated in a manner consistent with the guidance provided in "Office of Air quality Planning and Standards (OAQPS) Fabric Filter Bag Leak Detection Guidance" EPA-454/R-98-015, September 1997 and the manufacturer's written specifications and recommendations for installation, operation, and adjustment of the system.
- The initial adjustment of the system must, at a minimum, consist of establishing the baseline output by adjusting the sensitivity (range) and the averaging period of the device, and establishing the alarm set points and the alarm delay time.

- Following initial adjustment, the sensitivity or range, averaging period, alarm set points, or alarm delay time shall not be adjusted, except as detailed in the Baghouse O&M Manual. The sensitivity shall not be increased by more than 100 percent or decreased by more than 50 percent over a 365-day period unless such adjustment follows a complete baghouse inspection that demonstrates that the baghouse is in good operating condition.
- For negative pressure, induced air baghouses, and positive pressure baghouses that are discharged to the atmosphere through a stack, the bag leak detector shall be installed downstream of the baghouse.
- Where multiple detectors are required, the system's instrumentation and alarm may be shared among detectors.

2.21 Baghouse O&M Manual

Within 60 days after initial startup of the facility, the permittee shall have developed a Baghouse O&M Manual for the inspection and operation of the Rotary Furnace Baghouse, the Holding Kettle Room Baghouse, and the Fugitive Baghouse. The Baghouse O&M Manual shall be a permittee-developed document, but may include summaries of procedures from manufacturer-supplied operating manuals.

The Baghouse O&M Manual shall describe the procedures that will be followed to comply with the maintenance and operation General Provision, and shall contain requirements for weekly see/no see visible emission inspections of each baghouse. Inspections shall occur during daylight hours and under normal operating conditions. If any visible fugitive emissions are present from any baghouse, the permittee shall take appropriate corrective action as expeditiously as practicable to mitigate the visible emissions.

The Baghouse O&M Manual shall also include detailed procedures for inspection, maintenance, and bag leak detection and corrective action plans for all baghouses that are used to control process vents, process fugitive, or fugitive dust emissions. At a minimum, the document shall include:

- Procedures and corrective action plan for Baghouse Inspection and Routine Maintenance as specified in this permit.
- Procedures for Baghouse Inspection and Routine Maintenance, including the minimum requirements specified in this permit.
- Procedures used to ensure Reasonable Control of Fugitive Emissions as specified in this permit.
- Procedures for baghouse maintenance including, at a minimum, a preventative maintenance schedule that is consistent with the baghouse manufacturer's instructions for routine and long-term maintenance.

The permittee shall maintain records of the results of each baghouse inspection in accordance with the recordkeeping General Provision. The records shall include, but not be limited to, the following:

- Date and time of inspection or bag leak detection system alarm;
- Description of whether visible emissions were present.
- Equipment inspected and corrective action taken.
- Date corrective action was taken.

The Baghouse O&M Manual shall be submitted to DEQ within 60 days of permit issuance for review and comment, and shall contain a certification by a responsible official. A copy shall also be maintained on site. Any permittee or DEQ-requested changes to the Baghouse O&M Manual shall be submitted to the DEQ address provided in this permit within 15 days of the change.

The Baghouse O&M Manual shall remain on site at all times, and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the Baghouse O&M Manual are incorporated by reference to this permit, and are enforceable permit conditions.

2.22 Baghouse Inspection and Routine Maintenance

The procedures specified in the Baghouse O&M Manual for inspections and routine maintenance shall, at a minimum, include the following:

- Daily monitoring of pressure drop across each baghouse cell.
- Weekly confirmation that dust is being removed from hoppers through visual inspection, or equivalent means of ensuring the proper functioning of removal mechanisms.
- Daily check of compressed air supply for pulse-jet baghouses.
- An appropriate methodology for monitoring cleaning cycles to ensure proper operation.
- Monthly check of bag cleaning mechanisms for proper functioning through visual inspection or equivalent means.
- Monthly check of bag tension.
- Quarterly confirmation of the physical integrity of the baghouse through visual inspection of the baghouse interior for air leaks.
- Quarterly inspection of fans for wear, material buildup, and corrosion through visual inspection, vibration detectors, or equivalent means.
- Continuous operation of a bag leak detection system.

2.23 Baghouse Leak Detection Alarm

The permittee shall include in the Baghouse O&M Manual a corrective action plan that specifies the procedures to be followed in the case of a bag leak detection system alarm. The corrective action plan must include, at a minimum, the procedures that will be used to determine and record the time and cause of the alarm, as well as the corrective actions taken to minimize emissions;

- The procedures used to determine the cause of the alarm must be initiated within 30 minutes of the alarm.
- The cause of the alarm must be alleviated by taking the necessary corrective actions that may include, but not be limited to:

- Inspecting the baghouse for air leaks, torn or broken filter elements, or any other malfunction that may cause an increase in emissions.
- Sealing off defective bags or filter media.
- Replacing defective bags or filter media, or otherwise repairing the control device.
- Sealing off a defective baghouse compartment.
- Cleaning the bag leak detection system probe, or otherwise repairing the bag leak detection system.
- Shutting down the process producing the particulate emissions.

2.24 DEQ Address

All requests, reports, applications, submittals, certifications, and other communications required by this permit shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Lewiston Regional Office
1118 "F" St.
Lewiston, ID 83501

Phone: (208) 799-4370
Fax: (208) 799-3451

Testing Requirements

2.25 Baghouse Testing

The permittee shall conduct performance testing on the Kettles (1–12) no later than December 12, 2023, and least once every five years thereafter, to demonstrate compliance with the following emission limits:

- Lead emission limits in pounds per hour for the Rotary Furnace Baghouse, Holding Kettle Room Baghouse, and Fugitive Baghouse. Compliance may be demonstrated as measurement below detection limits, when addressed as part of a performance test protocol that is approved by DEQ.
- $PM_{2.5}$ emission limits in pounds per hour for the Rotary Furnace Baghouse, Holding Kettle Room Baghouse, and Fugitive Baghouse. Compliance may be demonstrated as measurement below detection limits, when addressed as part of a performance test protocol that is approved by DEQ.
- PM emission limit for the Rotary Furnace Baghouse in mg/dscm (gr/dscf).
- Opacity limits for the Rotary Furnace Baghouse, Holding Kettle Room Baghouse, and Fugitive Baghouse.

The source test shall be conducted under "worst case normal" conditions as required by IDAPA 58.01.01.157, the General Provisions of this permit, and the source test report shall contain documentation that the test was conducted under these conditions. The particulate matter performance tests shall be conducted in accordance with the procedures of EPA Reference Method 5, Method 202, and Method 9 in 40 CFR 60, Appendix A and the procedures of 40 CFR 60, Subpart L, or a DEQ-approved alternative. The lead performance tests shall be conducted using EPA Method 29. The permittee is encouraged to submit a source testing protocol for approval 30 days prior to conducting the performance tests.

[11/01/19]

2.26 Baghouse Test Monitoring

The permittee shall monitor and record the following during the performance test:

- The finished product weights of all materials charged and refined during each test run, in tons.
- The Tilting Rotary Furnace temperature, at least once every 15 minutes.
- The visible emissions observed, using the methods specified in 40 CFR 60, Subpart L and IDAPA 58.01.01.625.

2.27 Baghouse Test Reporting

Performance test reporting shall be conducted in accordance with the General Provisions of this permit and sent to the DEQ address provided in this permit.

2.28 NSPS 40 CFR 60, Subpart L – Test Methods

In accordance with 40 CFR 60.123, in conducting the performance tests required in 40 CFR 60.8, the permittee shall use as reference methods and procedures the test methods in Appendix A to 40 CFR 60, or other methods and procedures as provided in 40 CFR 60, Subpart L and 40 CFR 60.8(b). The permittee shall determine compliance with the PM standards in 40 CFR 60.122 as follows:

- Method 5 shall be used to determine the PM concentration during representative periods of furnace operation, including charging and tapping. The sampling time and sample volume for each run shall be at least 60 minutes and 0.90 dscm (31.8 dscf).
- Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity.

2.29 NSPS 40 CFR 60, Subpart A – General Provisions

The permittee shall comply with the requirements of 40 CFR 60, Subpart A – General Provisions. A summary of applicable requirements for affected facilities is provided in Table 2.3.

Table 2.3 40 CFR 60, Subpart A – Summary of General Provisions

Section	Subject	Summary of Section Requirements
60.4	Address	• DEQ is delegated this subpart and all requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart L shall be submitted to the DEQ address provided in this permit.
60.7(a),(b), and (f)	Notification and Recordkeeping	• Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date. • Notification shall be furnished of initial startup postmarked within 15 days of such date. • Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made. • Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative. • Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.
60.8	Performance Tests	• At least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present. • Within 60 days of achieving the maximum production rate, but not later 180 days after initial startup, performance test(s) shall be conducted and a written report of the results of such test(s) furnished. • Performance testing facilities shall be provided as follows: Sampling ports adequate for test methods applicable to such facility. Safe sampling platform(s). Safe access to sampling platform(s). Utilities for sampling and testing equipment. • Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f).
60.11(a), (d), (f), and (g)	Compliance with Standards and Maintenance Requirements	• When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8. • At all times, including periods of startup, shutdown, and malfunction, the owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. • For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
60.12	Circumvention	• No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.
60.14	Modification	• A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14. • Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.
60.15	Reconstruction	• An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.

2.30 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. Documents include, but are not limited to:

- Standards of Performance for New Stationary Sources (NSPS), 40 CFR 60, Subpart L
- Standards of Performance for New Stationary Sources (NSPS), 40 CFR 60, Subpart A

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

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]