



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

July 29, 2013

Scott Atkison
President
Idaho Forest Group
171 Highway 95 North
Grangeville, Idaho 83530

RE: Facility ID No. 049-00003, Idaho Forest Group, Grangeville
Final Tier I Operating Permit Letter

Dear Mr. Atkison:

The Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. TI-2012.0060 to Idaho Forest Group at Grangeville in accordance with IDAPA 58.01.01.300 through 386, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units. This permit replaces Tier I Operating Permit No. TI-2008.0203, issued March 20, 2008. The enclosed operating permit is based on the information contained in your permit application received on September 21, 2012. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the Rules.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Amber Rand, 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 the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Robert Baldwin at 208 373-0502 or robert.baldwin@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

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

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/reb Permit No. T1-2012.0060 PROJ 61109

Enclosure

AIR QUALITY

TIER I OPERATING PERMIT

Permittee Idaho Forest Group, LLC
Permit Number T1-2012.0060
Project ID 61109
Facility ID 049-00003
Facility Location 171 Highway 95 North
Grangeville, Idaho 83530

Permit Authority

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

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

Date Issued July 29, 2013

Date Expires July 29, 2018


Robert Baldwin, Permit Writer


Mike Simon, Stationary Source Manager

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1. Acronyms, Units, and Chemical Nomenclature

Bldg	building
Btu	British thermal unit
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CI	compression ignition
CO ₂ e	CO ₂ equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Idaho Department of Environmental Quality
EPA	United States Environmental Protection Agency
GHG	greenhouse gases
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
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
PC	permit condition
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
RICE	reciprocating internal combustion engines
T/yr	tons per consecutive 12-calendar-month period
T1	Tier I operating permit

2. Permit Scope

Purpose

- 2.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the Rules.
- 2.2 This Tier I operating permit incorporates the following permit(s):
- Permit to Construct No. P-2008.0204, issued February 17, 2009.
- 2.3 This Tier I operating permit supersedes the following permit(s):
- Tier I Operating Permit No. T1-2008.0203, issued March 20, 2008
 - Amended Tier I Operating Permit No. T1-2008.0203, issued February 17, 2009

Regulated Sources

Table 2.1 lists all sources of regulated emissions in this permit.

Table 2.1 REGULATED SOURCES

Permit Section	Source Description	Emissions Controls
2	Cyclone 12 - Sawmill Sawdust	Uncontrolled
	Cyclone 41 - Saw Sharpening Grindings	
	Cyclone 71 - Planer Chip Bin	
	Cyclone 73 - Planer Shavings Truck Bin	
	Cyclone 74 - Rosebud Bldg Planer Shavings	
	<u>Fugitive Dust Sources</u> Includes but not limited to: roads, saws, debarker, disc screen, conveyors, material transfer/drop points, etc.	Dust control in accordance with a Fugitive Dust Control Plan
3	<u>Hog Fuel Boiler</u> Manufacturer: Wellons Model No.: 2DS2C8.0A Rated steam rate: 80,000 pounds per hour Fuel value: 8,750 Btu per dry pound	<u>Multiclone</u> Manufacturer: Wellons Model No.: W-144 Air flow rate: 64,500 CFM at sea level & 350 °F. <u>Electrostatic Precipitator</u> Manufacturer: Wellons Model No.: Size No. 9 No. of T/R sets: 2
4	<u>Three Moore Dry Kilns</u> Manufacturer: Moore Length: 88 feet	Uncontrolled
	<u>Two Wellons Dry Kilns</u> Manufacturer: Wellons Length: 88 feet	
	Cyclone 11 - Sawmill Sawdust	<u>Baghouse</u> Manufacturer: Clarke Sheet Metal Model No.: CSM 60-20
	Cyclone 72 - Planer Shavings	<u>Baghouse</u> Manufacturer: Clarke Sheet Metal Model No.: 100-20G1

3. Facility-Wide Conditions

Table 3.1 contains a summary of requirements that apply generally to emissions units at the facility.

Table 3.1. Applicable requirements summary.

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
3.1–3.4	Fugitive Dust	Reasonable control	IDAPA 58.01.01.650–651	3.2–3.4, 3.25, 3.30
3.5–3.6	Odors	Reasonable control	IDAPA 58.01.01.775–776	3.6, 3.25
3.7–3.9	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.8–3.9, 3.25, 3.30
3.10–3.14	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130–136	3.10–3.14, 3.25, 3.30
3.15	PM	<u>Fuel oil only</u> 0.05 gr/dscf at 3% O ₂ <u>Wood only</u> 0.08 gr/dscf at 8% O ₂	IDAPA 58.01.01.676–677	3.16, 3.17
3.16–3.17	Sulfur Content	ASTM grade No. 1 fuel oil ≤ 0.3% by weight ASTM grade No. 2 fuel oil ≤ 0.5% by weight	IDAPA 58.01.01.725	3.17, 3.25, 3.30
3.18	Open Burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600–623	3.18, 3.25, 3.30
3.19	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	3.19, 3.25, 3.30
3.20	Accidental Release Prevention	Compliance with 40 CFR 68	40 CFR 68	3.20, 3.25, 3.30
3.21	Recycling and Emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	3.21, 3.25, 3.30
3.22–3.24	NSPS/NESHAP General Provisions	Compliance with 40 CFR 60, Subpart A Compliance with 40 CFR 63 Subparts ZZZZ and JJJJJ	IDAPA 58.01.01.107.03	3.22–3.24, 3.25, 3.30
3.25	Monitoring and Recordkeeping	Maintenance of required records	IDAPA 58.01.01.322.06	3.25, 3.25, 3.30
3.26–3.29	Testing	Compliance testing	IDAPA 58.01.01.157	3.26–3.29, 3.25, 3.30
3.30	Reports and Certifications	Submittal of required reports, notifications, and certifications	IDAPA 58.01.01.322.08	3.30
3.31	Incorporation of Federal Requirements by Reference	Compliance with applicable federal requirements referenced	IDAPA 58.01.01.107	3.31

Fugitive Dust

3.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651.

[IDAPA 58.01.01.650–651, 3/30/07]

- 3.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive emissions.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 3.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94]
- 3.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07, 5/1/94]

Odors

- 3.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
[IDAPA 58.01.01.775-776 (state only), 5/1/94]
- 3.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
[IDAPA 58.01.01.322.06, 07 (state only), 5/1/94]

Visible Emissions

- 3.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, 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]
- 3.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:
- a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

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

[IDAPA 58.01.01.322.06, 5/1/94]

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

[IDAPA 58.01.01.322.07, 5/1/94]

Excess Emissions

Excess Emissions—General

- 3.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions. The provisions of IDAPA 58.01.01.130–136 shall govern in the event of conflicts between the excess emissions facility wide conditions (Permit Conditions 3.11 through 3.14) and the regulations of IDAPA 58.01.01.130–136.

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

[IDAPA 58.01.01.132, 4/5/00]

Excess Emissions—Startup, Shutdown, and Scheduled Maintenance

- 3.11 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:
- Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.
 - Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the permittee demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
 - Reporting and recording the information required pursuant to the excess emissions reporting and recordkeeping requirements (Permit Conditions 3.13 and 3.14) and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133, 4/11/06]

Excess Emissions—Upset, Breakdown, or Safety Measures

- 3.12 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:
- Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
 - Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
 - Report and record the information required pursuant to the excess emissions reporting and recordkeeping facility wide conditions (Permit Conditions 3.13 and 3.14) and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
 - During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

[IDAPA 58.01.01.134, 4/11/06]

Excess Emissions—Reporting and Recordkeeping

- 3.13 The permittee shall submit a written report to DEQ for each excess emissions event, no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.
- 3.14 The permittee shall maintain excess emissions records at the facility for the most recent five calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:
- An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and
 - Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the permittee in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136, 4/5/00]

Fuel-burning Equipment

- 3.15 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, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676–677, 5/1/94]

Sulfur Content

3.16 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]

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

[IDAPA 58.01.01.322.07, 5/1/94]

Open Burning

3.18 The permittee shall comply with the “Rules for Control of Open Burning” (IDAPA 58.01.01.600–623).

[IDAPA 58.01.01.600–623, 5/08/09]

Asbestos

3.19 NESHAP 40 CFR 61, Subpart M—National Emission Standard for Asbestos

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M—“National Emission Standard for Asbestos.”

[40 CFR 61, Subpart M]

Accidental Release Prevention

3.20 (a)

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

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

[40 CFR 68.10 (a)]

Recycling and Emissions Reductions

3.21 40 CFR Part 82—Protection of Stratospheric Ozone

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

[40 CFR 82, Subpart F]

NSPS/NESHAP General Provisions

3.22 NSPS 40 CFR 60, Subpart A—General Provisions

The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A—“General Provisions”—in accordance with 40 CFR 60.1. Generally applicable requirements of Subpart A of the New Source Performance Standards (NSPS, 40 CFR 60) are summarized in Table 3.2. These summaries are provided to aid the permittee in understanding the general requirements and to highlight the notification and record keeping requirements of 40 CFR 60 for affected facilities. These summaries do not relieve the permittee from the responsibility to comply with all applicable requirements of the CFR, and are not intended to be a comprehensive listing of all requirements that may apply. Should there be a conflict between these summaries and the NSPS, the NSPS shall govern.

Table 3.2 NSPS 40 CFR 60, Subpart A—summary of general provisions.

Section	Section Title	Summary of Section
60.4	Address	<p>All notifications and reports shall be submitted to:</p> <p>Lewiston Regional Office Department of Environmental Quality 1118 "F" Street Lewiston, ID 83501 phone: (208) 799-4370 fax: (208) 799-3451</p>
60.7(b),(c)(d) and (f)	Notification and Record Keeping	<ul style="list-style-type: none"> • Notification of construction postmarked no later than 30 days of such date. • Notification of startup postmarked within 15 days of such date. • Notification of physical or operational change that may increase emissions postmarked 60 days before the change is made. • Maintain records of the occurrence and duration of any: startup, shutdown or malfunction of the affected source; malfunction of air pollution control device; and any period when a continuous monitoring system or monitoring device is inoperative. • For affected units with continuous monitoring device requirements report excess emissions and monitoring system performance semiannually, postmarked by January 30th and July 30th (in the format required by NSPS). • Maintain in a permanent form records suitable for inspection all measurements, system testing, performance measurements, calibration checks, adjustments and maintenance performed. Shall be maintained for a period of two years from the date the record is required to be generated by the applicable regulation. • CEMS record keeping requirements.
60.11(a),(b),(c), (d) and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> • Other than opacity standards, where performance tests are required compliance with standards is determined by methods and procedures established by 40 CFR 60.8. • Compliance with opacity standards shall be determined by Method 9 of Appendix A. The owner or operator may elect to use COM measurements in lieu of Method 9 provided notification is made at least 30 days before the performance test. • At all times, including periods of startup, shutdown, and malfunction to the extent practicable, the operator shall maintain and operate any affected facility and air pollution control equipment consistent with good air pollution control practices. • For the purposes of determining compliance with standards any

		creditable evidence may be used if the appropriate performance or compliance test procedure has been performed.
60.12	Circumvention	No owner or operator shall build, erect, install or use any article or method, including dilution, to conceal an emission which would otherwise constitute a violation.
60.13	Monitoring Requirements	All COMs and CEMs shall conform to the reporting, calibration and data reduction requirements specified in detail by this section. Reporting requirements include submitting performance evaluations reports within 60 days of the evaluations required by this section, and submitting results of the performance evaluations for the COMs within 10 days before a performance test if using COMs to determine compliance with opacity during a performance test.

[PTC No. P-2008.0204, 2/17/09; 40 CFR 60, Subpart A]

3.23 NESHAP 40 CFR 63, Subpart ZZZZ—General Provisions

The permittee shall comply with the applicable requirements of 40 CFR 63, Subparts ZZZZ and JJJJJ—“General Provisions”—in accordance with 40 CFR 63. Generally applicable requirements of 40 CFR 63, Subparts ZZZZ and JJJJJ are summarized in Table 3.3. These summaries are provided to aid the permittee in understanding the general requirements and to highlight the notification and record keeping requirements of 40 CFR 63 for affected facilities. These summaries do not relieve the permittee from the responsibility to comply with all applicable requirements of the CFR, and are not intended to be a comprehensive listing of all requirements that may apply. Should there be a conflict between these summaries and the 40 CFR 63, Subparts ZZZZ and JJJJJ 40 CFR 63, Subparts ZZZZ and JJJJJ shall govern.

TABLE 3.3 TO SUBPART ZZZZ OF PART 63—APPLICABILITY OF GENERAL PROVISIONS TO SUBPART ZZZZ.

As stated in § 63.6665, you must comply with the following applicable general provisions.

General provisions citation	Subject of citation	Applies to subpart	Explanation
§ 63.1	General applicability of the General Provisions	Yes.	
§ 63.2	Definitions	Yes	Additional terms defined in § 63.6675.
§ 63.3	Units and abbreviations	Yes.	
§ 63.4	Prohibited activities and circumvention	Yes.	
§ 63.5	Construction and reconstruction	Yes.	
§ 63.6(a)	Applicability	Yes.	
§ 63.6(b)(1)-(4)	Compliance dates for new and reconstructed sources	Yes.	
§ 63.6(b)(5)	Notification	Yes.	
§ 63.6(b)(6)	[Reserved]		
§ 63.6(b)(7)	Compliance dates for new and reconstructed area sources that become major sources	Yes.	
§ 63.6(c)(1)-(2)	Compliance dates for existing sources	Yes.	

§ 63.6(c)(3)-(4)	[Reserved]		
§ 63.6(c)(5)	Compliance dates for existing area sources that become major sources	Yes.	
§ 63.6(d)	[Reserved]		
§ 63.6(e)	Operation and maintenance	No.	
§ 63.6(f)(1)	Applicability of standards	No.	
§ 63.6(f)(2)	Methods for determining compliance	Yes.	
§ 63.6(f)(3)	Finding of compliance	Yes.	
§ 63.6(g)(1)-(3)	Use of alternate standard	Yes.	
§ 63.6(h)	Opacity and visible emission standards	No	Subpart ZZZZ does not contain opacity or visible emission standards.
§ 63.6(i)	Compliance extension procedures and criteria	Yes.	
§ 63.6(j)	Presidential compliance exemption	Yes.	
§ 63.7(a)(1)-(2)	Performance test dates	Yes	Subpart ZZZZ contains performance test dates at §§ 63.6610, 63.6611, and 63.6612.
§ 63.7(a)(3)	CAA section 114 authority	Yes.	
§ 63.7(b)(1)	Notification of performance test	Yes	Except that § 63.7(b)(1) only applies as specified in § 63.6645.
§ 63.7(b)(2)	Notification of rescheduling	Yes	Except that § 63.7(b)(2) only applies as specified in § 63.6645.
§ 63.7(c)	Quality assurance/test plan	Yes	Except that § 63.7(c) only applies as specified in § 63.6645.
§ 63.7(d)	Testing facilities	Yes.	
§ 63.7(e)(1)	Conditions for conducting performance tests	No.	Subpart ZZZZ specifies conditions for conducting performance tests at § 63.6620.
§ 63.7(e)(2)	Conduct of performance tests and reduction of data	Yes	Subpart ZZZZ specifies test methods at § 63.6620.
§ 63.7(e)(3)	Test run duration	Yes.	
§ 63.7(e)(4)	Administrator may require other testing under section 114 of the CAA	Yes.	
§ 63.7(f)	Alternative test method provisions	Yes.	
§ 63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes.	
§ 63.7(h)	Waiver of tests	Yes.	
§ 63.8(a)(1)	Applicability of monitoring requirements	Yes	Subpart ZZZZ contains specific requirements for monitoring at § 63.6625.
§ 63.8(a)(2)	Performance specifications	Yes.	
§ 63.8(a)(3)	[Reserved]		
§ 63.8(a)(4)	Monitoring for control devices	No.	
§ 63.8(b)(1)	Monitoring	Yes.	
§ 63.8(b)(2)-(3)	Multiple effluents and multiple	Yes.	

	monitoring systems		
§ 63.8(c)(1)	Monitoring system operation and maintenance	Yes.	
§ 63.8(c)(1)(i)	Routine and predictable SSM	No.	
§ 63.8(c)(1)(ii)	SSM not in Startup Shutdown Malfunction Plan	Yes.	
§ 63.8(c)(1)(iii)	Compliance with operation and maintenance requirements	No.	
§ 63.8(c)(2)-(3)	Monitoring system installation	Yes.	
§ 63.8(c)(4)	Continuous monitoring system (CMS) requirements	Yes	Except that subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).
§ 63.8(c)(5)	COMS minimum procedures	No	Subpart ZZZZ does not require COMS.
§ 63.8(c)(6)-(8)	CMS requirements	Yes	Except that subpart ZZZZ does not require COMS.
§ 63.8(d)	CMS quality control	Yes.	
§ 63.8(e)	CMS performance evaluation	Yes	Except for § 63.8(e)(5)(ii), which applies to COMS.
		Except that § 63.8(e) only applies as specified in § 63.6645.	
§ 63.8(f)(1)-(5)	Alternative monitoring method	Yes	Except that § 63.8(f)(4) only applies as specified in § 63.6645.
§ 63.8(f)(6)	Alternative to relative accuracy test	Yes	Except that § 63.8(f)(6) only applies as specified in § 63.6645.
§ 63.8(g)	Data reduction	Yes	Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at §§ 63.6635 and 63.6640.
§ 63.9(a)	Applicability and State delegation of notification requirements	Yes.	
§ 63.9(b)(1)-(5)	Initial notifications	Yes	Except that § 63.9(b)(3) is reserved.
		Except that § 63.9(b) only applies as specified in § 63.6645.	
§ 63.9(c)	Request for compliance extension	Yes	Except that § 63.9(c) only applies as specified in § 63.6645.
§ 63.9(d)	Notification of special compliance requirements for new sources	Yes	Except that § 63.9(d) only applies as specified in § 63.6645.
§ 63.9(e)	Notification of performance test	Yes	Except that § 63.9(e) only applies as specified in § 63.6645.
§ 63.9(f)	Notification of visible emission (VE)/opacity test	No	Subpart ZZZZ does not contain opacity or VE standards.
§ 63.9(g)(1)	Notification of performance evaluation	Yes	Except that § 63.9(g) only applies as specified in § 63.6645.

§ 63.9(g)(2)	Notification of use of COMS data	No	Subpart ZZZZ does not contain opacity or VE standards.
§ 63.9(g)(3)	Notification that criterion for alternative to RATA is exceeded	Yes	If alternative is in use.
		Except that § 63.9(g) only applies as specified in § 63.6645.	
§ 63.9(h)(1)-(6)	Notification of compliance status	Yes	Except that notifications for sources using a CEMS are due 30 days after completion of performance evaluations. § 63.9(h)(4) is reserved.
			Except that § 63.9(h) only applies as specified in § 63.6645.
§ 63.9(i)	Adjustment of submittal deadlines	Yes.	
§ 63.9(j)	Change in previous information	Yes.	
§ 63.10(a)	Administrative provisions for recordkeeping/reporting	Yes.	
§ 63.10(b)(1)	Record retention	Yes.	Except that the most recent 2 years of data do not have to be retained on site.
§ 63.10(b)(2)(i)-(v)	Records related to SSM	No.	
§ 63.10(b)(2)(vi)-(xi)	Records	Yes.	
§ 63.10(b)(2)(xii)	Record when under waiver	Yes.	
§ 63.10(b)(2)(xiii)	Records when using alternative to RATA	Yes	For CO standard if using RATA alternative.
§ 63.10(b)(2)(xiv)	Records of supporting documentation	Yes.	
§ 63.10(b)(3)	Records of applicability determination	Yes.	
§ 63.10(c)	Additional records for sources using CEMS	Yes	Except that § 63.10(c)(2)-(4) and (9) are reserved.
§ 63.10(d)(1)	General reporting requirements	Yes.	
§ 63.10(d)(2)	Report of performance test results	Yes.	
§ 63.10(d)(3)	Reporting opacity or VE observations	No	Subpart ZZZZ does not contain opacity or VE standards.
§ 63.10(d)(4)	Progress reports	Yes.	
§ 63.10(d)(5)	Startup, shutdown, and malfunction reports	No.	
§ 63.10(e)(1) and (2)(i)	Additional CMS Reports	Yes.	
§ 63.10(e)(2)(ii)	COMS-related report	No	Subpart ZZZZ does not require COMS.
§ 63.10(e)(3)	Excess emission and parameter exceedances reports	Yes.	Except that § 63.10(e)(3)(i) (C) is reserved.
§ 63.10(e)(4)	Reporting COMS data	No	Subpart ZZZZ does not require COMS.
§ 63.10(f)	Waiver for recordkeeping/reporting	Yes.	
§ 63.11	Flares	No.	

§ 63.12	State authority and delegations	Yes.	
§ 63.13	Addresses	Yes.	
§ 63.14	Incorporation by reference	Yes.	
§ 63.15	Availability of information	Yes.	

[75 FR 9688, Mar. 3, 2010]

[40 CFR 63, Subpart ZZZZ, Table 8]

3.24 NESHAP 40 CFR 63, Subpart JJJJJJ —General Provisions

TABLE 3.4 TO SUBPART JJJJJJ OF PART 63—APPLICABILITY OF GENERAL PROVISIONS TO SUBPART JJJJJJ

As stated in § 63.11235, you must comply with the applicable General Provisions according to the following:

General provisions cite	Subject	Does it apply?
§ 63.1	Applicability	Yes.
§ 63.2	Definitions	Yes. Additional terms defined in § 63.11237.
§ 63.3	Units and Abbreviations	Yes.
§ 63.4	Prohibited Activities and Circumvention	Yes.
§ 63.5	Preconstruction Review and Notification Requirements	No
§ 63.6(a), (b)(1)-(b)(5), (b)(7), (c), (f)(2)-(3), (g), (i), (j)	Compliance with Standards and Maintenance Requirements	Yes.
§ 63.6(e)(1)(i)	General Duty to minimize emissions	No. See § 63.11205 for general duty requirement.
§ 63.6(e)(1)(ii)	Requirement to correct malfunctions ASAP	No.
§ 63.6(e)(3)	SSM Plan	No.
§ 63.6(f)(1)	SSM exemption	No.
§ 63.6(h)(1)	SSM exemption	No.
§ 63.6(h)(2) to (9)	Determining compliance with opacity emission standards	Yes.
§ 63.7(a), (b), (c), (d), (e)(2)-(e)(9), (f), (g), and (h)	Performance Testing Requirements	Yes.
§ 63.7(e)(1)	Performance testing	No. See § 63.11210.
§ 63.8(a), (b), (c)(1), (c)(1)(ii), (c)(2) to (c)(9), (d)(1) and (d)(2), (e), (f), and (g)	Monitoring Requirements	Yes.
§ 63.8(c)(1)(i)	General duty to minimize emissions and CMS operation	No.
§ 63.8(c)(1)(iii)	Requirement to develop SSM Plan for CMS	No.
§ 63.8(d)(3)	Written procedures for CMS	Yes, except for the last sentence, which refers to an SSM plan. SSM plans are not required.

§ 63.9	Notification Requirements	Yes, excluding the information required in § 63.9(h)(2)(i)(B), (D), (E) and (F). See § 63.11225.
§ 63.10(a) and (b)(1)	Recordkeeping and Reporting Requirements	Yes.
§ 63.10(b)(2)(i)	Recordkeeping of occurrence and duration of startups or shutdowns	No.
§ 63.10(b)(2)(ii)	Recordkeeping of malfunctions	No. See § 63.11225 for recordkeeping of (1) occurrence and duration and (2) actions taken during malfunctions.
§ 63.10(b)(2)(iii)	Maintenance records	Yes.
§ 63.10(b)(2)(iv) and (v)	Actions taken to minimize emissions during SSM	No.
§ 63.10(b)(2)(vi)	Recordkeeping for CMS malfunctions	Yes.
§ 63.10(b)(2)(vii) to (xiv)	Other CMS requirements	Yes.
§ 63.10(b)(3)	Recordkeeping requirements for applicability determinations	No.
§ 63.10(c)(1) to (9)	Recordkeeping for sources with CMS	Yes.
§ 63.10(c)(10)	Recording nature and cause of malfunctions	No. See § 63.11225 for malfunction recordkeeping requirements.
§ 63.10(c)(11)	Recording corrective actions	No. See § 63.11225 for malfunction recordkeeping requirements.
§ 63.10(c)(12) and (13)	Recordkeeping for sources with CMS	Yes.
§ 63.10(c)(15)	Allows use of SSM plan	No.
§ 63.10(d)(1) and (2)	General reporting requirements	Yes.
§ 63.10(d)(3)	Reporting opacity or visible emission observation results	No.
§ 63.10(d)(4)	Progress reports under an extension of compliance	Yes.
§ 63.10(d)(5)	SSM reports	No. See § 63.11225 for malfunction reporting requirements.
§ 63.10(e)	Additional reporting requirements for sources with CMS	Yes.
§ 63.10(f)	Waiver of recordkeeping or reporting requirements	Yes.
§ 63.11	Control Device Requirements	No.
§ 63.12	State Authority and Delegation	Yes.
§ 63.13-63.16	Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions	Yes.
§ 63.1(a)(5), (a)(7)-(a)(9), (b)(2), (c)(3)-(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (h)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4),	Reserved	No.

Monitoring and Recordkeeping

3.25 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating 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.

The permittee is not required to conduct the monitoring and associated recordkeeping for any emission unit if the emissions unit did not operate at any time between required monitoring events, provided the following conditions are met:

- The permittee makes a contemporaneous record in the log or file maintained on site of the date and time that the emission unit ceased operation, and the reason why the emission unit did not operate.
- The permittee makes a contemporaneous record in a log or file maintained on site of the date and time that the emission unit resumed operation.

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

Performance Testing

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

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

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

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

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

- 3.29 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 3.30).

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

Reports and Certifications

- 3.30 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130–136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Lewiston Regional Office
1118 F Street
Lewiston, Idaho 83501
Phone: (208) 799-4370
Fax: (208) 799-3451

The periodic compliance certification required in the general provisions shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 4/5/00]

Incorporation of Federal Requirements by Reference

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

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

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

[IDAPA 58.01.01.107, 4/7/11]

4. Hog Fuel Boiler

Summary Description

The Wellons hog fuel-fired boiler supplies up to 80,000 pounds per hour of steam to five kilns which are used to dry lumber. The rated heat input capacity of the boiler is 116 million BTU/hr.

The PM and PM₁₀ emissions from the boiler are controlled by a multiclone and an electrostatic precipitator (ESP).

Table 4.1 describes the devices used to control emissions from hog fuel boiler.

Table 4.1 Hog Fuel Boiler Description

Emissions Units	Control Devices
Hog fuel boiler	Multiclone and electrostatic precipitator

Table 4.2 contains only a summary of the requirements that apply to the Hog fuel boiler. Specific permit requirements are listed below.

Table 4.2 Applicable requirements summary.

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
4.1	PM ₁₀	6.6 lb/hr	PTC No. P-2008.0204	4.4, 4.5, 4.6, 4.7, 4.8, 4.9, 4.10, 4.11, 4.12, 4.13, 4.14, 4.16, 4.17, 4.18, 4.19, 4.20, 4.21, 4.26
4.2	PM	0.1 lb/MMBtu	40 CFR 60.43b	4.9, 4.13, 4.14, 4.15, 4.16, 4.17, 4.18, 4.19, 4.20, 4.21, 4.26
4.3	Visible Emissions	1.) 20% opacity (six-minute average), except for one six-minute period per hour of not more than 27% opacity, and 2.) 20% opacity for no more than three minutes in any 60-minute period.	40 CFR 60.43b and IDAPA 58.01.01.625	4.7
4.4	Steaming rate	1.92 million pounds of steam per day	PTC No. P-2008.0204	4.15
4.21-4.24		Notification of Compliance Status	40 CFR 63 Subpart JJJJJ	4.25

Emission Limits

4.1 PM₁₀ Emission Limit

Emissions of PM₁₀ from the boiler stack shall not exceed 6.6 pounds per hour (lb/hr).

[PTC No. P-2008.0204, 2/17/09]

4.2 **Particulate Matter Emission Limit in Accordance with 40 CFR 60.43b(c)(1) - NSPS**

Particulate matter emissions from the boiler shall not exceed 0.1 pounds per million Btu of heat input in accordance with 40 CFR 60.43b (c) (1). When compliance is determined, this shall be done by conducting a performance test as specified in 40 CFR 60.8. The particulate matter standard applies at all times, except during periods of startup, shutdown or malfunction in accordance with 40 CFR 60.43b(g).

[PTC No. P-2008.0204, 2/17/09; 40 CFR 60.43b]

4.3 **Opacity Limits**

4.3.1 On and after the date on which the initial performance test is completed or is required to be completed under 40 CFR 60.8, whichever date comes first, the boiler shall not discharge into the atmosphere any gases that exhibit greater than 20% opacity (six-minute average), except for one six-minute period per hour of not more than 27% opacity, in accordance with 40 CFR 60.43b(f). The opacity standard applies at all times, except during periods of startup, shutdown or malfunction in accordance with 40 CFR 60.43b(g).

[40 CFR 60.43b]

4.3.2 The permittee shall not discharge any air pollutant to the atmosphere from the boiler stack for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, 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; PTC No. P-2008.0204, 2/17/09]

Operating Requirements

4.4 **Daily Steam Production Limit**

The amount of steam produced by the boiler shall not exceed 1.92 million pounds of steam per day.

[PTC No. P-2008.0204, 2/17/09]

4.5 **Fuel Type**

The permittee shall fire the boiler exclusively with biomass.

[PTC No. P-2008.0204, 2/17/09]

4.6 **Control Device Requirements**

4.6.1 A multiclone and an ESP shall be used to control PM and PM₁₀ emissions from the boiler. The multiclone and the ESP shall be maintained in good working order and operated as efficiently as practical in accordance with the Operations and Maintenance (O&M) manual specifications required by Permit Condition. 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.

4.6.2 For the ESP, the permittee shall install, maintain, and operate, in accordance with the O&M manual specifications, equipment to measure the secondary voltage, amperage, and power (where power equals the voltage multiplied by the amperage) applied by each transformer/rectifier (T/R) set to the discharge electrodes, and the spark rate, to demonstrate compliance with Permit Conditions.

4.6.3 The secondary voltage, amperage and power applied by each T/R set to the discharge electrodes, and the spark rate, of the ESP shall be maintained within O&M manual specifications. Documentation of O&M manual voltage, amperage, power input and spark rate specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

4.7 **Continuous Opacity Monitoring System (COMS) - NSPS**

4.7.1 For the boiler, the permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system in accordance with 40 CFR 60.48b(a) or per an EPA-approved alternative.

4.7.2 The COMS data shall be reduced and recorded in such a manner that compliance with all applicable opacity standards can be demonstrated.

[PTC No. P-2008.0204, 2/17/09; 40 CFR 60.48b]

4.8 In accordance with 40 CFR 63.11196(a), the permittee must conduct the initial tune-up no later than March 21, 2014.

[40 CFR 63.11196(a)(1)]

4.9 In accordance with 40 CFR 63.11196(a), the permittee must conduct the energy assessment no later than March 21, 2014.

[40 CFR 63.11196(a)(3)]

4.10 In accordance with 40 CFR 63.11223(a), the permittee must conduct a tune-up of the boiler biennially, each biennial tune-up specified must be conducted no more than 25 months after the previous tune-up. The permittee must conduct the tune-up while burning the type of fuel that provided the majority of the heat input to the boiler over the 12 months prior. The management practices in Table 2 of subpart JJJJJ apply at all times.

[40 CFR 63 Subpart JJJJJ, Table 2, 40 CFR 63.11201(b), (d), 40 CFR 63.11223(a)]

4.11 In accordance with 40 CFR 63 Subpart JJJJJ, 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 requirements are waived in instances where past or amended energy assessments 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:

- A visual inspection of the boiler or process heater system.
- An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,
- An inventory of major energy consuming systems,
- A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
- A list of major energy conservation measures,
- A list of the energy savings potential of the energy conservation measures identified, and
- A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time for recouping those investments.
- The energy assessment will be 8 on-site technical labor hours in length maximum, but may be longer at the discretion of the owner or operator of the affected source. The boiler system(s) and any on-site energy use system(s) accounting for at least 50 percent of the affected boiler(s) energy (e.g., steam, hot water, or electricity) production, as applicable, will be evaluated to identify energy savings opportunities, within the limit of performing an 8-hour energy assessment.

[40 CFR 63 Subpart JJJJJ, Table 2, 40 CFR 63.11201(b), 40 CFR 63.11237]

- 4.12 In accordance with 40 CFR 63.11205(a), the permittee must operate and maintain the unit in a matter consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR 63.11205(a)]
- 4.13 In accordance with 40 CFR 63.11210(c), the permittee must demonstrate initial compliance with the work practice standard and management practice above by dates listed above. [40 CFR 63.11210(c)]
- 4.14 In accordance with 40 CFR 63.11223(b), the permittee must conduct a tune-up of the boiler or process heater biennially to demonstrate continuous compliance as follows:
- 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, but you inspect each burner at least every 36 months);
 - 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;
 - Inspect the system controlling the air to fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly;
 - Optimize total emissions of carbon monoxide. This optimization should be consistent with manufacturer's specifications, if available;
 - Measure the concentrations in the effluent stream of carbon monoxide 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; and
 - Maintain on-site and submit, if requested by the Administrator, a biennial report containing the following information:
 - The concentrations of carbon monoxide in the effluent stream in part per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler;
 - A description of any corrective actions taken as a part of the combustion adjustment; and
 - The type and amount of fuel used over the 12 month prior to the biennial tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period.
 - 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.
- [40 CFR 63.11223(b)]

Monitoring and Recordkeeping Requirements

4.15 Steam and Fuel Monitoring and Recordkeeping Requirements

- 4.15.1 The permittee shall monitor and record the total pounds of steam produced by the boiler on a daily basis. Records shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request.
- 4.15.2 For purposes of complying with the requirements under 40 CFR 60.49(b)(d), the permittee is not required to monitor the amount of wood combusted each day or to calculate the annual capacity factor for wood in accordance with the alternative method approved by EPA Region 10 in a letter issued to the facility on October 4, 2005.

[PTC No. P-2008.0204, 2/17/09; 40 CFR 60.49(b)]

4.16 PM and PM₁₀ Performance Test

At least once every five years the permittee shall conduct a performance test to measure PM and PM₁₀ emissions from the boiler stack. The test shall be conducted to demonstrate compliance with the emission rate limits specified by Permit Conditions. Each performance test conducted to

demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157, and the following information shall be complied with during each test run:

- Visible emissions from the boiler stack shall be observed and recorded using the methods specified in IDAPA 58.01.01.625 to demonstrate compliance with the visible emission permit condition.
- The boiler shall be operated at the worst case normal feed material throughput rate during the performance test. A description of how this requirement was met shall be included in the performance test report.
- The following parameters shall be monitored and recorded during each PM and PM₁₀ performance test on the boiler stack:
 - Wood-waste fuel analysis including percent moisture and BTUs per pound (Btu/lb)
 - Amount of steam produced in units of pounds of steam per hour; and
 - Secondary voltage, amperage, and power (where power equals the voltage multiplied by the amperage) applied by each T/R set of the ESP to the discharge electrodes, and the spark rate.

After the initial performance test, future testing shall be performed according to the following schedule. If the PM and PM₁₀ emission rate measured in the most recent test is less than or equal to 75% of the emission standard in this permit, the next test shall be conducted within five years of the test date. If the PM and PM₁₀ 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 this permit, the next test shall be conducted within two years of the test date. If the PM and PM₁₀ emission rate measured during the most recent performance test is greater than 90% of the emission standard in this permit, the next test shall be conducted within one year of the test date.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-2008.0204, 2/17/09]

4.17 Monitoring Requirement

When the boiler is operating, the permittee shall monitor and record the secondary voltage, amperage and power applied by each T/R set to the discharge electrodes, and the spark rate at least once every four hours. The units of measure and averaging time of measurements of secondary voltage, amperage, power, and spark rate recorded shall be consistent with O&M manual units of measure. A compilation of the most recent five years of voltage, amperage, power and spark rate records shall be kept at the facility and shall be made available to DEQ representatives upon request.

[PTC No. P-2008.0204, 2/17/09]

4.18 Operations and Maintenance Manual Requirements

Operation and Maintenance manuals (or a single manual) shall be maintained for the boiler, the multiclone, and the ESP. The permittee shall maintain an O&M manual for the multiclone and the ESP according to manufacturer specifications and recommendations. The manual(s) shall be revised within 30 days of issuance of this permit to incorporate any changes made as part of this permit. This manual shall describe the methods and procedures that will be followed to assure the boiler, multiclone, and the ESP are maintained in good working order and operated as efficiently as practical. The O&M manuals shall be updated as necessary and shall include the following, at a minimum: the most recent general descriptions of the equipment; manufacturer's recommended settings regarding secondary voltage, amperage and power for each T/R set of the ESP and the spark rate; the normal operating conditions and procedures for the boiler; startup, shutdown, and maintenance procedures; inspection procedures and inspection frequency; upset conditions guidelines; and corrective action procedures.

[PTC No. P-2008.0204, 2/17/09]

4.19 In accordance with 40 CFR 63.11225(c), the permittee must keep the following records:

- Copies of each notification and report submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status.
- Records of the date of each tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
- Copy of energy assessment report.
- Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment
- Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in Section 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.

[40 CFR 63.11225(c)]

4.20 In accordance with 40 CFR 63.11225(d), records must be in a form suitable and readily available for expeditious review. Records must be kept for 5 years, two of which must be on-site. Records may be kept off-site for the remaining three years.

[40 CFR 63.11225(d)]

Reporting Requirements

Compliance Test Protocol

4.21 The permittee is strongly encouraged to submit a compliance test protocol for approval at least 30 days prior to conducting any compliance test required by this permit. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the test does not satisfy the testing requirements.

[PTC No. P-2008.0204, 2/17/09]

4.22 The permittee must conduct a tune-up and submit a signed statement in the Notification of Compliance Status report that indicates that the tune-up has been completed.

[40 CFR 63.11214(b)]

4.23 In accordance with 40 CFR 63.11214(c), the permittee must submit a signed certification in the Notification of Compliance Status report that indicates that an energy assessment of the boiler and energy use system has been completed and submit, upon request, the energy assessment report.

[40 CFR 63.11214(c)]

4.24 In accordance with 40 CFR 63.11225(a)(1)-(2), the permittee must submit an initial notification as specified in Section 63.9(b)(2) not later than 120 days after January 20, 2014.

[40 CFR 63.11225(a)(1)-(2)]

4.25 In accordance with 40 CFR 63.11225(a)(4), the permittee must submit a Notification of Compliance Status in accordance with 40 CFR 63.9(h) no later than 120 days after the applicable compliance dates for tune-ups and energy assessment listed above. 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. In addition to the information required in 40 CFR 63.9(h)(2) the notification must include the following statements, as applicable:

- "This facility complies with the requirements in Section 63.11214 to conduct an initial tune-up of the boiler."
- "This facility has had an energy assessment performed according to Section 63.11214(c)."

[40 CFR 63.11225(a)(1), (4)]

4.26 In accordance with 40 CFR 63.11225(b), the permittee must prepare by March 1 of every other year, and submit to the delegated authority upon request, a biennial compliance certification report. If there are any instances of deviations from applicable requirements during the reporting period, the permittee must submit the report by March 15. The report must include the following:

- Company name and address
- 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 relevant standards and other requirements of this subpart
- If the source experiences any deviation 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.

[40 CFR 63.11225(b)]

4.27 **Compliance Test Report**

The permittee shall submit a report of the results of any compliance test and the results of any fuel analysis required in by this permit, including all required process data, to DEQ within 30 days after the date on which any required compliance test is concluded, in accordance with IDAPA 58.01.01.157.

[IDAPA 58.01.01.157, 4/5/00; PTC No. P-2008.0204, 2/17/09]

5. Production Equipment

Summary Description

Idaho Forest Group LLC produces dimensional lumber products at the Grangeville facility. The processes include log handling, debarking, sawing, drying in kilns, planing, and material handling. Saleable products include dimensional lumber, wood chips, bark, and rosebud horse bedding.

PM and hazardous air pollutant (HAP) emissions from the kilns are controlled by limitations on the amount of lumber that may be dried. Fugitive dust emissions from sources such as roads, saws, debarker, disc screen, conveyors, and material transfer drop points are controlled per a site-specific Fugitive Dust Control Plan. PM emissions from six of the facility's material transfer system cyclones are uncontrolled and baghouses are used to control PM from the remaining two cyclones.

Table 5.1 describes the devices used to control emissions from the production equipment.

TABLE 5.1 Production Equipment description.

Emissions Units / Processes	Control Devices
<u>Three Moore Dry Kilns</u> Manufacturer: Moore Length: 88 feet	Uncontrolled
<u>Two Wellons Dry Kilns</u> Manufacturer: Wellons Length: 88 feet	
Cyclone 11 - Sawmill Sawdust	<u>Baghouse</u> Manufacturer: Clarke Sheet Metal Model No.: CSM 60-20
Cyclone 72 - Planer Shavings	<u>Baghouse</u> Manufacturer: Clarke Sheet Metal Model No.: 100-20G1

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

TABLE 5.2 Applicable requirements summary.

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
5.1	HAP	10 T/yr of Methanol and 25 T/yr of any combination of hazardous air pollutants	IDAPA 58.01.01.008.10.a	5.3, 5.6, 5.7, 5.9
5.2	Formaldehyde	714 lb/yr	PTC No. P-2008.0204	5.3, 5.8, 5.9
5.3	Kiln throughput	250 million board feet per any consecutive 12-month period.	PTC No. P-2008.0204	5.3, 5.9
5.4	PM	Baghouse operation and maintenance	PTC No. P-2008.0204	5.5, 5.10, 5.11

Emission Limits

5.1 HAP Emission Limits

The Idaho Forest Group LLC shall emit less than the following amounts of any hazardous air pollutant which has been listed pursuant to 42 U.S.C. Section 7412(b), as defined under IDAPA 58.01.01.008.10.a. For purposes of complying with this requirement, a year is defined as any consecutive 12-month period:

5.1.1 10 tons per year of methanol; and

5.1.2 25 tons per year of any combination of any hazardous air pollutants

[IDAPA 58.01.01.008.10.a, 5/1/94; PTC No. P-2008.0204, 2/17/09]

5.2 Formaldehyde Emission Limit

The combined emissions of formaldehyde from all of the kilns shall not exceed 714 pounds per any consecutive 12-month period (lb/yr).

[PTC No. P-2008.0204, 2/17/09]

Operating Requirements

5.3 Kiln Throughput Limit

The total quantity of wood dried in the all of the kilns shall not exceed 250 million board feet per any consecutive 12-month period.

[PTC No. P-2008.0204, 2/17/09]

5.4 Baghouses

5.4.1 The permittee shall install, maintain, and operate a baghouse to control PM emissions from Cyclone 11 (sawmill sawdust) and a baghouse to control emissions from cyclone 72 (planer shavings). Each baghouse shall be operated at all times that the cyclone connected to it is operating.

[PTC No. P-2008.0204, 2/17/09]

5.4.2 When in operation, the pressure drop across each baghouse shall be maintained within manufacturer's and Operation and Maintenance (O&M) Manual specifications. Documentation of the operating pressure drop specifications for each baghouse shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-2008.0204, 2/17/09]

5.5 Baghouse Monitoring Equipment

The permittee shall install, maintain, and operate, in accordance with manufacturer's specifications, equipment to measure the pressure differential across each baghouse.

[PTC No. P-2008.0204, 2/17/09]

Monitoring and Recordkeeping Requirements

5.6 Methanol Monitoring

The total combined emissions of methanol from all of the lumber drying kilns (kilns) shall be calculated and recorded on a monthly basis, in units of tons per month and tons per consecutive 12-month period (T/yr), to demonstrate compliance with Permit Condition 5.1.1. Methanol emissions from all of the kilns shall be calculated using the equation given below and the emission factors in Table 5.1, or DEQ-approved factors:

$$Kiln\ HAP = \sum_{i=1}^n (X_i \times Y_i) (ton / 2000lbs)$$

Where:

Kiln HAP = Kiln Emissions of a specific HAP per month (ton/mo)

n = Number of types of wood dried

X_i = Throughput, in mbf, of lumber of type i dried in all kilns per month (mbf/mo)

Y_i = Methanol emission factor for lumber of type i

Table 5.1 HAP Emission Factors ^a

Type of wood dried	Methanol ^b (lb/mbf)	Formaldehyde ^b (lb/mbf)	Acetaldehyde ^c (lb/mbf)	MEK ^{c, d} (lb/mbf)	Phenol ^e (lb/mbf)
Ponderosa	0.065	0.0029	0.0078	0.0013	0.004
White Fir	0.122	0.0028	0.0078	0.0013	0.004
Lodgepole	0.060	0.0040	0.0078	0.0013	0.004
Douglas Fir	0.023	0.0010	0.0078	0.0013	0.004

^aUse the factors in this table, or DEQ-approved alternative factors in the kiln emissions equation

^bFactors from the Oregon State University Small-scale Kiln Study, Milota, September 29, 2000

^cNCASI factors as published in Table D-4 of the June 9, 2000 letter from K. Hanks, MRI, to M. Kissell, EPA

^dMethyl ethyl ketone (MEK); pounds per 1000 board feet (lb/mbf)

^eOlympic Region Clean Air Agency emission factor

[PTC No. P-2008.0204, 2/17/09]

5.7 25 TPY HAP Monitoring

5.7.1 The total combined emissions of all HAPs from all of the kilns and the Wellons boiler shall be calculated and recorded on a monthly basis, in units of tons per month and tons per consecutive 12-month period (T/yr), to demonstrate compliance with the 25 TPY aggregate HAP limit given in Permit Condition 5.1.2.

5.7.2 The total HAP emissions from all of the kilns shall be determined by calculating the combined emissions of methanol, formaldehyde, acetaldehyde, methyl ethyl ketone (MEK), and phenol from all of the kilns using the equation format specified in Permit Condition 5.6.

5.7.3 HAP emissions from the Boiler shall be calculated using the equation below.

$$Boiler\ HAP = \sum_{i=1}^n (X_i \times Y_i) (1/0.65) (995\ Btu / lb - steam) (ton / 2000lbs)$$

Where:

Boiler HAP = Boiler HAP emissions per month (ton/mo)

n = Number of different HAPs emitted by the Boiler

X_i = Steam production in million pounds per month (MMlb-steam/mo)

Y_i = Emission factor for HAP "i" from AP-42 Section 1.6 or a DEQ-approved factor

[IDAPA 58.01.01.008.10.a.ii, 5/1/94; PTC No. P-2008.0204, 2/17/09]

5.8 Formaldehyde Monitoring

The total combined emissions of formaldehyde from all of the kilns shall be calculated and recorded on a monthly basis, in units of pounds per month and pounds per consecutive 12-month period (lb/yr), to demonstrate compliance with the kiln emission limit in Permit Condition 5.2. The

formaldehyde emissions shall be calculated using the equation format given in Permit Condition 5.6.

[PTC No. P-2008.0204, 2/17/09]

5.9 **Kiln Throughput**

Each month, the permittee shall monitor and record the following kiln production information in units of board feet per month (bf/mo) and board feet per the most recent consecutive 12-month period (bf/yr):

- The quantity of each species of wood processed in all of the kilns; and
- The total sum of all wood species processed in all of the kilns.

[PTC No. P-2008.0204, 2/17/09]

5.10 **Baghouse Operations and Maintenance Manual Requirements**

An Operation and Maintenance manual shall be maintained to address each of the two baghouses. The permittee shall develop the O&M manual according to the manufacturer's specifications and recommendations for each baghouse. This manual shall describe the methods and procedures that will be followed to assure that each baghouse is maintained in good working order and operated as efficiently as practical. The O&M manual shall be updated as necessary and shall include, at a minimum, the most recent general descriptions of the equipment, the normal operating conditions, the manufacturer's recommended minimum and maximum pressure drops for each Baghouse, maintenance procedures, inspection procedures and inspection frequency, and upset condition guidelines.

[PTC No. P-2008.0204, 2/17/09]

5.11 **Baghouse Pressure Drop Monitoring**

When a baghouse is operated, the permittee shall measure and record the following information on a weekly basis:

- The pressure drop across the Baghouse connected to Cyclone 11; and
- The pressure drop across the Baghouse connected to Cyclone 72.

[PTC No. P-2008.0204, 2/17/09]

6. Fire Pump Engine

Summary Description

Idaho Forest Group LLC(IFG) operates a Cummins N-855-F diesel –fired pump engine, manufactured in 1974 with a maximum power capacity of 218 horsepower (hp). The IFG facility is a synthetic area source with respect to HAPs because it is limited to less than 10 tons per year of a single HAP and less than 25 tons per year of total HAPs. The fire pump engine is classified as an existing stationary source engine under 300 hp located at an area source of HAP and must comply with the 40 CFR 63 subpart ZZZZ as it applies.

Table 6.1 describes the devices used to control emissions from fire pump engine.

TABLE 6.1 Fire Pump Engine Description.

Emissions Units / Processes	Control Devices
Cummins N-855-F diesel-fired fire pump engine	None

Table 6.2 contains only a summary of the requirements that apply to the fire pump engine. Specific permit requirements are listed below.

TABLE 6.2 Applicable requirements summary.

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
6.1	RICE	Work Practices	40 CFR 63 Subpart ZZZZ	6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.11, 6.12

Operating Requirements

6.1 In accordance with 40 CFR 63.6595(a), the engine identified above must comply with the applicable requirements of NESHAP ZZZZ before May 3, 2013.

[40 CFR 63.6595(a)(1)]

- 6.2 In accordance with 40 CFR 63.6603 Table 2d, the permittee shall change the oil and filter every 1000 hours of operation or annually, whichever comes first or at a frequency determined by an oil sample and analysis program as follows
- Sample and analyze the oil annually or every 1000 hours of operation, whichever comes first to determine total base number, viscosity, and water content by volume.
 - If one or more of the following condemning limits for these parameters is exceeded then the permittee is required to change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation then the permittee must change the oil within 2 days of receiving the results or before commencing operation, whichever is later.
 - Total Base Number is less than 30% of the Total Base Number when the oil is new.
 - Viscosity of the oil has changed by more than 20% from the viscosity of the oil when new.
 - Percent Water Content (by volume) is greater than 0.5.
 - The permittee must keep records of the oil analysis results and the oil and filter changes for the engine.

[40 CFR 63.6603 Table 2d, 40 CFR 63.6603(a), 40 CFR 63.6625(i)]

- 6.3 In accordance with 40 CFR 63.6603 Table 2d, the permittee shall inspect air cleaners every 1000 hours of operation or annually, whichever comes first.

[40 CFR 63.6603 Table 2d, 40 CFR 63.6603(a)]

- 6.4 In accordance with 40 CFR 63.6603 Table 2d, the permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6603 Table 2d, 40 CFR 63.6603(a)]

- 6.5 In accordance with 40 CFR 63.6625(e), the permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must ensure, to the extent practicable, the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e)]

- 6.6 In accordance with 40 CFR 63.6625(h), the permittee must minimize the engine's time spent at idle and at startup to a period needed for appropriate and safe loading, not to exceed 30 minutes, after which time the non-startup emissions limitations apply.

[40 CFR 63.6625(h)]

- 6.7 In accordance with 40 CFR 63.6605(a-b), the permittee must be in compliance with the preceding management practice standards at all times as well as maintaining and operating any affected source in a manner consistent with safety and good air pollution control.

[40 CFR 63.6605(a-b)]

- 6.8 In accordance with 40 CFR 63.6640(a), the permittee must demonstrate compliance with the preceding management practice standards by operating and maintaining the stationary RICE according to the manufacturer's emission-related instructions or by developing and following their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice.

[40 CFR 63.6640(a), Table 6]

Monitoring and Recordkeeping Requirements

- 6.9 In accordance with 40 CFR 63.6640(e), each instance in which the unit did not meet the requirements of the applicable general provisions listed in Table 8 of this subpart must be recorded.

[40 CFR 63.6640(e)]

- 6.10 In accordance with 40 CFR 63.6655(e), if the permittee follows their own maintenance plan rather than the manufacturer's written instructions they must keep records of maintenance conducted on the stationary RICE.

[40 CFR 63.6655(e)]

Reporting Requirements

- 6.11 In accordance with 40 CFR 63.6640(b), the permittee must report each instance of deviation from the management practice standards.

[40 CFR 63.6640(b)]

- 6.12 In accordance with 40 CFR 63.6645(a)(5), the permittee is subject to the General Requirements provided in Table 8 except for the notification requirements of 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

[40 CFR 63.6665, 63.6645(a)(5)]

7. 40 CFR 64—Compliance Assurance Monitoring

Summary Description

- 7.1 The purpose of this section of the permit is to include all of the applicable requirements of 40 CFR 64, "Compliance Assurance Monitoring" (CAM). CAM requires selecting compliance indicators that when operated within specified ranges provide a reasonable assurance of compliance. CAM also requires monitoring, record keeping, and reporting requirements.
- 7.2 Table 7.1 lists the emissions units and pollutants that are applicable to CAM and details the monitoring requirements for each emissions unit which the permittee shall comply with. The table also specifies the specific values that are approved to determine when an excursion has occurred.
- Emissions Unit: Hog Fuel Boiler/ multiclone and ESP
 - Regulated Pollutant(s): PM₁₀

TABLE 7.1 Compliance Assurance Monitoring Requirements for Emission Unit

Requirement Indicator	Indicator No 1 Opacity
Measurement Approach	COMS – used to measure opacity
Indicator Range	<10% opacity for a calendar 24 hour averaging period. The period starting at 0000 hours (midnight) and ending at 2400 (midnight the next day).
Performance Criteria Data Representativeness	Opacity is a principal indicator of particulate matter emissions, as recognized by the NSPS requirement to install and operate a COMS
Verification of Operational Status	Control Room instrumentation – DAS records opacity data. IFG's DAS already calculates daily opacity averages.
QA/QC Practices	IFG will comply with 40 CFR 60 Performance Specifications as they apply
Monitoring Frequency	Continuous – at least one every 15 minutes
Data Collection Procedure	Data logging system records opacity
Averaging Period	Calendar day average. The period of time starting at the beginning of the day at 0000 hours (12:00am midnight) and ending 24 hours later.

Excursion is defined in 40 CFR 64 as a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.

CAM Recordkeeping

- 7.3 In accordance with 40 CFR 64.7(a), the permittee shall conduct the monitoring required under this permit upon issuance. [40 CFR 64.7(a)]
- 7.4 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. [40 CFR 64.7(b)]
- 7.5 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 hog fuel boiler 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. [40 CFR 64.7(c)]
- 7.6 In accordance with 40 CFR 64.7(d), upon detecting an excursion or exceedance, the permittee shall restore operation of the hog fuel boiler (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. [40 CFR 64.7(d)]
- 7.7 In accordance with 40 CFR 64(b), for the description of the control device(s) (e.g., multiclone in series with a wet scrubber and cyclone separator), if the manufacturer specifications for the monitoring devices for indicator 1 (e.g., pressure drop) and indicator 2 (e.g., scrubbing media flow rate) include calibration procedures but do not specify a calibration frequency, the device shall be calibrated at least once each calendar year. [40 CFR 64.3(b)(1), (2), and (3)]
- 7.8 In accordance with 40 CFR 64.6(c)(2), an exceedance shall be defined as any measured emission of pollutant (PM₁₀) which exceed any corresponding emissions limit specified for the emissions unit in Table 4.2 [40 CFR 64.6(c)(2)]
- 7.9 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.

[40 CFR 64.7(e)]

- 7.10 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 hog fuel boiler's operating time for a reporting period.

[40 CFR 64.8(a)]

- 7.11 In accordance with 40 CFR 64.9(a)(2), the reports required by the Semiannual Monitoring Reports and Reporting Deviations and Excess Emissions General Provisions shall include the following information for those emissions units listed in Table 7.1

- Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken
- 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)

[40 CFR 64.9(a)(2)]

- 7.12 In accordance with 40 CFR 64.9(b), the permittee 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).

[40 CFR 64.9(b)]

- 7.13 Should there be a conflict between 40 CFR 64 and any of Permit Conditions of this permit, the 40 CFR 64 shall govern.

[IDAPA 58.01.01.322.02, 5/1/94]

8. Insignificant Activities

- 8.1 Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in Table 8.1. 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 3).

Table 8.1 Insignificant Activities.

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Boiler relief valve(s)	IDAPA 58.01.01.317.01.a.1.77
Boiler blowdown	IDAPA 58.01.01.317.01a.i.1,2
All facility fuel and volatile storage and transfer operations	IDAPA 58.01.01.317.01.b.i.1,2
Any onsite welding	IDAPA 58.01.01.317.01.b.i.9
Painting and coating operations	IDAPA 58.01.01.317.01.b.i.17,25
Kerosene, natural gas, or propane space heaters under 5 MMBtu/hr	IDAPA 58.01.01.317.01.b.i.18
Parts cleaning	IDAPA 58.01.01.317.01.b.i.26
All other facility fugitive emission sources, including: facility vehicle traffic, sawing, conveyors, transfer sources, storage sources, debarking, screening, hog, log watering system, and associated sources	IDAPA 58.01.01.317.01b.i.30
Emergency diesel generator	IDAPA 58.01.01.317.01.b.i.30
Cyclone CY75	IDAPA 58.01.01.317.01.b.i.30
Flare Chipper	IDAPA 58.01.01.317.01.b.i.30

There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

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

9. General Provisions

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

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

Reopening

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

Property Rights

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

Information Requests

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

Severability

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

Changes Requiring Permit Revision or Notice

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

Federal and State Enforceability

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

Inspection and Entry

- 9.14 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 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

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

Fees

9.16 The permittee shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

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

Certification

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

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

Renewal

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

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

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

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

Permit Shield

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

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

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

Compliance Schedule and Progress Reports

9.21 The permittee shall comply with the following:

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

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

Periodic Compliance Certification

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

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

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

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

False Statements

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

No Tampering

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

Semiannual Monitoring Reports

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

Reporting Deviations and Excess Emissions

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

Permit Revision Not Required

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

Emergency

- 9.29 In accordance with IDAPA 58.01.01.332, an "emergency," as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.
[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]