



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

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

March 23, 2017

Jeff Abbott, Plant Engineer  
Bennett Lumber Products  
P.O. Box 130  
Princeton, Idaho 83857

RE: Facility ID No. 057-00008, Bennett Lumber Products, Princeton  
Final Tier I Operating Permit Letter

Dear Mr. Abbott:

The Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. T1-2014.0031 to Bennett Lumber Products at Princeton 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 T1-050201, issued February 11, 2010. The enclosed operating permit is based on the information contained in your permit application received on August 12, 2014. 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 Almer Casile, Air Quality Analyst, at 208-666-4600 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 Tom Burnham at 208 373-0502 or [tom.burnham@deq.idaho.gov](mailto:tom.burnham@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS/tb                      Permit No. T1-2014.0031 PROJ 61408

Enclosure

# AIR QUALITY

## TIER I OPERATING PERMIT

**Permittee** Bennett Lumber Products  
**Permit Number** T1-2014.0031  
**Project ID** 61408  
**Facility ID** 057-00008  
**Facility Location** 3759 Highway 6  
Princeton, Idaho 83857

### 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** March 23, 2017

**Date Expires** March 23, 2022

  
Tom Burnham, Permit Writer

  
Mike Simon, Stationary Source Manager

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# 1. Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
CAM	Compliance Assurance Monitoring
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
COMS	continuous opacity monitoring systems
°F	degrees Fahrenheit
DEQ	Idaho Department of Environmental Quality
dscf	dry standard cubic feet
EPA	United States Environmental Protection Agency
gr	grains (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per consecutive 12-calendar-month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PTE	potential to emit
PW	process weight rate
RICE	reciprocating internal combustion engines
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>

SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12-calendar-month period
T1	Tier I operating permit
ULSD	ultra-low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compound

## 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 for the Control of Air Pollution in Idaho. This project is the second renewal of the facility's Tier I operating permit.
- 2.2 This Tier I operating permit incorporates the following permit(s):
- Permit to Construct No. P-2007.0107, issued January 17, 2011
  - Tier I Operating Permit No. T1-050201, issued January 17, 2011
- 2.3 This Tier I operating permit replaces the following permit(s):
- Tier I Operating Permit No. T1-050201, issued February 11, 2010

### Regulated Sources

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

Table 2.1. Regulated Sources

Permit Section	Source Description	Emissions Control(s)
4	<b>Zurn Industries hog-fuel boiler:</b> Type C, rated at 60,000 pound per hour saturated steam; installed 1978	Zurn Industries multiclone followed by Zurn wet scrubber
5	<b>Dry kilns No. 1 and No. 2:</b> Manufacturer: Moore Length: 73 feet Design: Double track Installed June 1972 and June 1964  <b>Dry Kiln No. 3:</b> Manufacturer: Lumber systems Inc Length: 73 feet Design: Single track Installed: March 1984  <b>Dry Kilns No. 4, No. 5, and No. 6:</b> Manufacturer: Lumber systems Inc. Length: 73 feet Design: Double track Installed: June 1977, June 1977, and January 1989, respectively  <b>Dry Kiln No. 7</b> Manufacturer: Wellons Length: 73 feet Design: Double-track Installed: October 2005	None
6	<b>Woodworking Equipment</b>	Sawdust Cyclone P7 Shavings Cyclone P11 Shavings Cyclone P12 Shavings Cyclone P13 Shavings Cyclone P14 Sawdust Cyclone P21 Baghouse P24 Baghouse Cyclone P6
7	<b>Emergency compression ignition engine</b> Manufacturer: John Deere Model: 6081AF001 Rated Capacity: 270 hp	None

### 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	Fugitive Dust	Reasonable control	IDAPA 58.01.01.650–651	3.2, 3.3, 3.4, 3.22, 3.27
3.5	Odors	Reasonable control	IDAPA 58.01.01.775–776	3.6, 3.22
3.7	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.8, 3.9, 3.22, 3.27
3.10–3.14	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130–136	3.10–3.14, 3.22, 3.27
3.15	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	3.16, 3.22, 3.27
3.17	Open Burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600–624	3.17, 3.22, 3.27
3.18	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	3.18, 3.22, 3.27
3.19	Accidental Release Prevention	Compliance with 40 CFR 68	40 CFR 68	3.19, 3.22, 3.27
3.20	Recycling and Emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	3.20, 3.22, 3.27
3.21	NSPS/NESHAP General Provisions	Compliance with 40 CFR 63, Subpart A	IDAPA 58.01.01.107.03	3.22, 3.27
3.22	Monitoring and Recordkeeping	Maintenance of required records	IDAPA 58.01.01.322.06	3.22, 3.27
3.23–3.26	Testing	Compliance testing	IDAPA 58.01.01.157	3.22, 3.25, 3.26, 3.27, 3.28
3.27	Reports and Certifications	Submittal of required reports, notifications, and certifications	IDAPA 58.01.01.322.08	3.27, 10.17
3.28	Incorporation of Federal Requirements by Reference	Compliance with applicable federal requirements referenced	IDAPA 58.01.01.107	3.22, 3.27, 3.28
3.29	Facility-wide HAP Limits	9.49 T/yr for any one HAP; 24.49 T/yr for all HAP combined	P-2007.0107 (01/17/11)	3.22, 4.11, 5.7

## **Fugitive Dust**

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

[IDAPA 58.01.01.650-651, 4/11/15]

- 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 dust 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 receipt 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 quarterly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust 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 quarterly fugitive dust 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 dust 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<sub>x</sub>, 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 quarterly 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 3.10 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.

[IDAPA 58.01.01.135, 4/11/06]

**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]

### **Sulfur Content**

**3.15** 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
- 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, SO<sub>2</sub> emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 4/11/15]

**3.16** 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**

**3.17** The permittee shall comply with the “Rules for Control of Open Burning” (IDAPA 58.01.01.600–624).

[IDAPA 58.01.01.600–624, 3/29/12]

### **Asbestos**

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

The permittee shall comply with all applicable emissions standards pursuant to 40 CFR 61, Subpart M—“National Emission Standard for Asbestos.”

[40 CFR 61, Subpart M]

## Accidental Release Prevention

**3.19** 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

### **3.20** 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

### **3.21** NESHAP 40 CFR 63, Subpart A—General Provisions

The permittee shall comply with all applicable requirements as they apply in regards to 40 CFR 63, Subpart A—“General Provisions.” A summary of applicable requirements for affected sources is provided in Table 3.2.

[40 CFR 63, Subpart A]

## Monitoring and Recordkeeping

**3.22** 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.

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

## Performance Testing

- 3.23** 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.
- 3.24** 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]

- 3.25** Unless a longer time is approved by DEQ, the permittee shall submit a compliance test report for the respective test to DEQ within 60 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.
- 3.26** The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the "Reports and Certifications" facility wide condition (Permit Condition 3.27).

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

## Reports and Certifications

- 3.27** 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 (General Provision 10.22) 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**

**3.28** 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:

- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63, Subparts ZZZZ and JJJJJ.

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, 3/25/16]

## **Facility-Wide Limits on Hazardous Air Pollutant Emissions**

**3.29** Facility-wide emissions in any consecutive 12-calendar months shall not exceed 9.49 tons of any one hazardous air pollutant (HAP), and 24.49 tons for all HAPs combined.

[PTC No. P-2007.0107, 01/17/11]

## 4. Hog Fuel Boiler

### Summary Description

Bark from the log debarking process is sent to a bark hog where it is reduced to a size appropriate for use as boiler fuel and conveyed to the main fuel conveyor (TR10). Sawdust from the sawmill and shavings from the planing mills are also conveyed to the main fuel conveyor to be used as boiler fuel. The Zurn Industries hog-fuel boiler is an Erie City Type C, three-drum water tube boiler using a spreader-stoker firing method with ash reinjection and four (4) manually-operated soot blowers. The boiler is designed to continuously provide 60,000 pounds per hour of saturated steam at 250°F to the lumber drying kilns. Particulate emissions from the Zurn Industrial Boiler are controlled by a multiclone in series with a wet scrubber and cyclone separator.

[PTC No. P-2007.0107, 01/17/11]

Table 4.1 contains only a summary of the requirements that apply to the hog-fuel boiler. Specific permit requirements are listed below the table.

Table 4.1. Applicable requirements summary

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
4.1	PM grain loading	PM emissions shall not exceed 0.200 gr/dscf at 8% oxygen	IDAPA 58.01.01.677	4.5, 4.7, 4.8, 4.10
4.2	PM <sub>10</sub> emissions limits	PM <sub>10</sub> hourly and annual emissions limits	PTC P-2007.0107 (01/17/2011)	4.5, 4.7, 4.8, 4.10
4.3	Fuel Type	Exclusively wood products	PTC P-2007.0107 (01/17/2011)	3.22
4.4	Steaming rate	Determine by equation (not to exceed 60, 000 lb/hr)	PTC P-2007.0107 (01/17/2011)	4.7, 4.10, 4.12
4.5	Multiclone and scrubber	Maintain pressure drop, conduct routine maintenance	PTC P-2007.0107 (01/17/2011) 40 CFR 64.3	4.5, 4.6
4.7	Performance test	Determine PM <sub>10</sub> hourly emission rate and PM grain loading	PTC P-2007.0107 (01/17/2011) IDAPA 58.01.01.157, IDAPA 58.01.01.322.09, 40 CFR 64.3	4.8, 4.10
4.13	Zurn Industrial Boiler	Tune up, Energy Assessment, Work Practices/Management Practice Standards	40 CFR 63, Subpart JJJJJ	4.14, 4.15, 4.16, 4.17, 4.18, 4.19, 4.20, 4.21, Table 2 to Subpart JJJJJ

[IDAPA 58.01.01.322.06, 07, 08, 5/1/94]

### Emission Limits

4.1 The permittee shall not discharge into the atmosphere from any fuel burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 million Btu per hour, particulate matter in excess of 0.200 gr/dscf corrected to 8% oxygen while combusting wood fuel.

[PTC No. P-2007.0107, 01/17/11; IDAPA 58.01.01.677]

4.2 The PM<sub>10</sub> and CO emissions from the hog-fuel boiler stack shall not exceed any corresponding emission rate limits listed in Table 4.2.

**Table 4.2. Hog fuel Boiler Hourly and Annual Emissions Limits<sup>a</sup>**

Source Description	PM <sub>10</sub> <sup>b</sup>		CO
	lb/hr	T/yr <sup>c</sup>	T/yr
Zurn hog fuel boiler	27	99.48	249

<sup>a</sup>As determined by a pollutant-specific U.S. EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

<sup>b</sup>Includes condensables.

<sup>c</sup>As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

[PTC No. P-2007.0107, 01/17/11]

## Operating Requirements

### 4.3 Fuel Type

The hog fuel boiler shall be fueled exclusively by wood products.

[PTC No. P-2007.0107, 01/17/11]

### 4.4 Steam Production and Steaming Rate Limits

The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the steam production rate of the Zurn Industries hog fuel boiler. If the continuous steaming rate measurement system becomes inoperable, a backup monitoring method consisting of manual hourly readings or calculations shall be implemented within 96 hours of the continuous steaming rate measurement system becoming inoperable, and shall be used until the original system is operational.

[PTC No. P-2007.0107, 01/17/11]

On a 24-hour average, the operational steaming rate shall be maintained at or below the lesser of:

- 60,000 pounds of steam per hour,
- A maximum steaming rate in pounds per hour based on the average one-hour steaming rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with the PM<sub>10</sub> lb/hr emissions limit in Permit Condition 3.3.1 of PTC, calculated as follows:

$$\text{Max. steaming rate} = \text{Avg. steaming rate during test} \times \frac{27 \text{ lb/hr PM}_{10}}{\text{Tested lb/hr PM}_{10}}$$

- A maximum rate in pounds per hour based on the average one-hour steaming rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with the grain loading emissions limit in Permit Condition 3.3.2 of PTC, calculated as follows:

$$\text{Max. steaming rate} = \text{Avg. steaming rate during test} \times \frac{0.20 \text{ gr/dscf @ 8\% Oxygen}}{\text{Tested grain loading @ 8\% Oxygen}}$$

The permittee may conduct additional performance tests during the permit term to revise the allowable steaming rate so long as the performance tests conform to all requirements of this permit. Whenever the steaming rate exceeds the allowable steaming rate, the permittee shall take corrective action within a reasonable time, but no longer than 24 hours from the discovery of the exceedance, to bring the steaming rate to the allowable rate or below. Deviations from this allowable operating rate shall not constitute a violation of this permit, unless the permittee fails to take corrective action or an emission standard prescribed in this permit is exceeded. DEQ may consider the frequency, duration, or magnitude of the deviations to determine if additional action is required.

[PTC No. P-2007.0107, 01/17/11]

#### 4.5 Multiclone and Wet Scrubber Operations

The permittee shall install and operate a multiclone in series with a wet scrubber and cyclone separator to control the emissions from the hog fuel boiler in accordance with CAM Requirements for the Zurn Hog Fuel Boiler Table 4.3.

[40 CFR 64.7, PTC No. P-2007.0107, 01/17/11]

- The multiclone and wet scrubber shall be in operation at all times during operation of the hog fuel boiler in accordance with CAM Requirements for the Zurn Hog Fuel Boiler Table 4.3.

[40 CFR 64.7, PTC No. P-2007.0107, 01/17/11]

- The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the ID fan outlet (scrubber inlet) pressure and the pressure drop across the multiclone during operation of the hog fuel boiler in accordance with CAM Requirements for the Zurn Hog Fuel Boiler Table 4.3.

[40 CFR 64.7, PTC No. P-2007.0107, 01/17/11]

- The permittee shall install, operate, calibrate, and maintain a device to continuously measure the scrubbing media flow rate in gallons per minute in accordance with CAM Requirements for the Zurn Hog Fuel Boiler Table 4.3.

[40 CFR 64.7, PTC No. P-2007.0107, 01/17/11]

- CAM Indicator Requirements

**Table 4.3. Compliance Assurance Monitoring Requirements for the Zurn Hog Fuel Boiler**

INDICATOR	Wet Scrubber Pressure Drop (Measured as the ID fan outlet static pressure)	Wet Scrubber Water Flow Rate
<b>MONITORING DESIGN</b>		
Measurement Approach	The ID fan outlet pressure gauge is located at the ID fan outlet just upstream of the wet scrubber inlet. It represents the pressure drop across the wet scrubber, because gauge pressure downstream of the scrubber is zero since it exhausts to the atmosphere.	The scrubber water flow is measured using a flow meter located in the water supply header to the scrubber nozzles. Scrubber flow is determined by direct observation of the meter gauge.
Indicator Ranges	An excursion is defined as a pressure of less than 0.5 inches of water or greater than 7.5 inches of water.	An excursion is defined as a scrubber water flow of less than 350 gpm.

PERFORMANCE CRITERIA		
Data Representativeness	The ID fan outlet pressure is located upstream from the wet scrubber. The monitor gauge is marked in 0.5 in. H <sub>2</sub> O increments.	The scrubber water flow meter is located in the water supply header. Manufacturer's specifications indicate the gauge is accurate to +/- 5% of actual flow
QA/QC Practices	Instrumentation is calibrated annually. It is observed daily; troubleshooting and maintenance will be initiated at any sign of questionably effective operation	No calibration required per manufacturer's specifications. Instrument is observed daily, troubleshooting, maintenance, or replacement will be initiated at any sign of questionably effective operation.
Monitoring Frequency	The ID fan outlet pressure is monitored continuously and recorded a minimum of once per day.	The wet scrubber water flow is monitored continuously and recorded a minimum of once per day.
Data Collection Procedure	The pressure shall be manually recorded in the boiler operating log.	The flow rate shall be manually recorded in the boiler operating log.
Averaging Period	Instantaneous (never to be exceeded)	Instantaneous (never to be exceeded)

[40 CFR 64.7]

#### 4.6 Performance Testing Operations

The permittee may conduct additional performance tests during the permit term to revise the allowable ID fan outlet (scrubber inlet) pressure or the minimum scrubbing media flow rate so long as the performance tests conform to all the requirements of this permit and the performance tests demonstrate compliance with the PM<sub>10</sub> pound per hour limit and the grain loading standard for the Zurn hog-fuel boiler while operating at the alternative operating parameters.

- The performance test shall be conducted in accordance with the Test Methods and Procedures specified in the Rules (IDAPA 58.01.01.157) and in accordance with a DEQ-approved source test protocol.
- The permittee may request to operate outside of the operating parameters specified by the manufacturer during the performance test by submitting a written source test protocol to DEQ for approval and requesting to operate under alternative operating parameters for the duration of the test.
- The protocol shall describe how the operating parameters will be monitored during the performance test.
- Once the source test is completed the permittee may request in writing to operate in accordance with alternative operating parameters. The request shall include a source test report and justification for the alternative operating parameters.

[PTC No. P-2007.0107, 01/17/11]

## Monitoring and Recordkeeping Requirements

### 4.7 Performance Testing

The permittee shall conduct a performance test at least once every five years on the Zurn hog-fuel boiler to demonstrate compliance with the opacity limit, the PM<sub>10</sub> lb/hr emissions limit, and the grain loading standard.

The permittee shall test in accordance with IDAPA 58.01.01.157 and the conditions of this permit including the operating requirements for the Zurn hog-fuel boiler and General Provision 6. General Provision 6 includes notification requirements, testing procedures, and reporting requirements.

The source test shall be conducted under “worst case normal” conditions as required by IDAPA 58.01.01.157 and General Provision 6 and the source test report shall contain documentation that the test was conducted under these conditions.

During the next required performance test, at least one particulate matter test run shall be conducted with a scrubber pressure drop of less than or equal to 1.0 inch of water to demonstrate compliance with the opacity limit, the PM<sub>10</sub> lb/hr emissions limit, and the grain loading standard at the low-end of the CAM indicator range. The boiler steaming rate shall be  $\geq 20,000$  pounds of steam per hour during the test run(s) conducted to verify compliance at the low pressure drop.

The following information, at a minimum, shall be recorded during each performance test run and included in the performance test report:

- The steam production rate of the boiler shall be recorded in pounds per hour;
- The pressure drop across the multiclone and the ID fan outlet (scrubber inlet) pressure shall be recorded in inches of water at least once each 15 minutes during each test run;
- The scrubbing media flow rate shall be recorded in gallons per minute once each 15 minutes during each test run;
- Visible emissions from the boiler stack shall be observed and recorded during each test run, using the methods specified in IDAPA 58.01.01.625.

[PTC No. P-2007.0107, 01/17/11]

4.8 After the initial performance test, future testing shall be performed according to the following schedule. If the PM or PM<sub>10</sub> emission rate measured in the most recent test is less than or equal to 75% of the applicable emission limit, the next test shall be conducted within five years of the test date. If the PM or PM<sub>10</sub> emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the applicable emission limit, the next test shall be conducted within two years of the test date. If the PM or PM<sub>10</sub> emission rate measured during the most recent performance test is greater than 90% of the applicable emission limit, the next test shall be conducted within one year of the test date.

[PTC No. P-2007.0107, 01/17/11]

If the opacity limit, the grain loading standard and the PM<sub>10</sub> lb/hr emissions limit measured during the next performance test conducted with a scrubber pressure drop of less than or equal to 1.0 inches of water and boiler steaming rate greater than or equal to 20,000 pounds of steam per hour to demonstrate compliance with this permit, no further testing under this condition shall be required.

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

4.9 *RESERVED*

4.10 **Maintain Copy of Source Tests**

A copy of the most recent DEQ-approved source test for each pollutant tested and a copy of the corresponding DEQ review/approval letter which contains the permit number shall remain onsite at all times and shall be made available to Department representatives upon request.

[PTC No. P-2007.0107, 01/17/11]

4.11 **HAPs Monitoring**

The permittee shall calculate and record the emissions of methanol and total HAPs from the hog-fuel boiler on a monthly basis, in units of tons per month and tons for the most recent consecutive 12-calendar month period.<sup>1</sup> These totals shall be combined with the methanol and total HAPs emissions from the kilns for the same period to demonstrate compliance with the facility-wide HAPs limits.

[PTC No. P-2007.0107, 01/17/11]

4.12 **Steam Production Monitoring for Boiler**

The permittee shall monitor and record the daily steam production of the boiler to demonstrate compliance with steam production limit. Each month, the permittee shall sum the daily steam production for that month and for the previous 12 consecutive calendar-month period. Records shall be maintained on site and shall be made available to DEQ representatives upon request.

[PTC No. P-2007.0107, 01/17/11]

The permittee shall calculate the annual PM<sub>10</sub> emissions as follows:

- Multiply the total monthly steam produced by the emission factor derived from the most recent DEQ-approved source test. The emission factor shall be in pounds of PM<sub>10</sub> per pound of steam produced during the test.
- Sum the monthly PM<sub>10</sub> emissions derived above for each 12-consecutive calendar month period.

[PTC No. P-2007.0107, 01/17/11]

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<sup>1</sup> Recommended HAP emissions calculations are described in the Statement of Basis for PTC P-2007.0107, Project No. 60629.

## **Federal Requirements**

### **40 CFR 63 Subpart JJJJJJ – Requirements**

#### **“National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources”**

- 4.13** In accordance with 40 CFR 63.11201(b), you must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 to this subpart satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement.
- 4.14** In accordance with 40 CFR 63.11201(d), these standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time you must comply only with Table 2 to this subpart.
- 4.15** In accordance with 40 CFR 63.11205(a), at all times, you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
- 4.16** In accordance with 40 CFR 63.11214(b), you must conduct a performance tune-up according to §63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.
- 4.17** In accordance with 40 CFR 63.11223(a), you must conduct a performance tune-up according to paragraph (b) of this section and keep records as required in §63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.
- 4.18** In accordance with 40 CFR 63.11223(c), boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up must conduct a tune-up of the boiler every 5 years as specified in paragraphs (b)(1) through (7) of this section. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed boiler with an oxygen trim system, the first 5-year tune-up must be no later than 61 months after the initial startup. You may delay the burner inspection specified in paragraph (b)(1) of this section and inspection of the system controlling the air-to-fuel ratio specified in paragraph (b)(3) of this section until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months.
- 4.19** In accordance with 40 CFR 63.11225(c), you must maintain the records specified in paragraphs (c)(1) through (7) of this section.
- (1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

- (2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this section.
    - (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
    - (iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.
  - (4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
  - (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- 4.20** In accordance with 40 CFR 63.11225(d), your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years.
- 4.21** In accordance with 40 CFR 63.11225(g), if you have switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within subpart JJJJJ, in the boiler becoming subject to subpart JJJJJ, or in the boiler switching out of subpart JJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to subpart JJJJJ, you must provide notice of the date upon which you switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:
- (1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.
  - (2) The date upon which the fuel switch, physical change, or permit limit occurred.
- 4.22** In accordance with 40 CFR 63.11226, In response to an action to enforce the standards set forth in §63.11201 you may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction, as defined at 40 CFR 63.2. Appropriate penalties may be assessed if you fail to meet your burden of proving all of the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief.
- 4.23** In accordance with 40 CFR 63.11226(a) Assertion of affirmative defense. To establish the affirmative defense in any action to enforce such a standard, you must timely meet the reporting requirements in paragraph (b) of this section, and must prove by a preponderance of evidence that:
- (1) The violation:
    - (i) Was caused by a sudden, infrequent, and unavoidable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner; and
    - (ii) Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and
    - (iii) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and

- (iv) Was not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and
- (2) Repairs were made as expeditiously as possible when a violation occurred; and
- (3) The frequency, amount, and duration of the violation (including any bypass) were minimized to the maximum extent practicable; and
- (4) If the violation resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and
- (5) All possible steps were taken to minimize the impact of the violation on ambient air quality, the environment, and human health; and
- (6) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and
- (7) All of the actions in response to the violation were documented by properly signed, contemporaneous operating logs; and
- (8) At all times, the affected source was operated in a manner consistent with good practices for minimizing emissions; and
- (9) A written root cause analysis has been prepared, the purpose of which is to determine, correct, and eliminate the primary causes of the malfunction and the violation resulting from the malfunction event at issue. The analysis shall also specify, using best monitoring methods and engineering judgment, the amount of any emissions that were the result of the malfunction.

**4.24** In accordance with 40 CFR 63.11226(b) *Report*, the owner or operator seeking to assert an affirmative defense shall submit a written report to the Administrator with all necessary supporting documentation, that it has met the requirements set forth in paragraph (a) of this section. This affirmative defense report shall be included in the first periodic compliance, deviation report or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance, deviation report or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance, deviation report or excess emission report due after the initial occurrence of the violation of the relevant standard.

**Table 8 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

General provisions cite	Subject	Does it apply?
§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	No.
§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.

General provisions cite	Subject	Does it apply?
§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), 63.10(c)(2)-(4), (c)(9)	Reserved	No.

## 5. Drying Kilns

### Summary Description

Green dimensional lumber from the sawmill is dried in a series of drying kilns to reduce the moisture content from around 43-47% to around 19%. Saturated steam from the Zurn Hog Fuel Boiler provides heat to the kilns to dry the lumber.

Table 5.1 describes the devices used to control emissions from drying kilns.

**Table 5.1. Drying Kilns**

Emissions Units / Processes	Control Devices
Lumber Drying Kilns No. 1 through No. 7	None

Table 5.2 contains only a summary of the requirements that apply to the drying kilns. Specific permit requirements follow Table 5.2

**Table 5.2. Applicable Requirements Summary**

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
5.1	Emission Limits	PM <sub>10</sub> - 3.94 T/yr, VOC - 110.3 T/yr	PTC No. P-2007.0107 (01/17/11)	5.4, 5.5
5.2, 5.3	Particulate Matter	Equations	IDAPA 58.01.01.702 IDAPA 58.01.01.701	5.6
5.4	Throughput to kilns	157,585 thousand board feet (lumber scale)	PTC No. P-2007.0107 (01/17/11)	5.6
5.5	Kiln Temperature Monitoring Device	Facility-wide HAP limits	PTC No. P-2007.0107 (01/17/11)	5.8
5.6	Throughput by wood species	Facility-wide HAP limits	PTC No. P-2007.0107 (01/17/11)	5.6
5.7	HAPs Monitoring	Equation	PTC No. P-2007.0107 (01/17/11)	5.4, 5.5, 5.6, 5.8

## Emission Limits

- 5.1 The PM<sub>10</sub> and VOC emissions from the Kilns 1 through 7 vents (combined) shall not exceed any corresponding emissions rate limits listed in Table 5.3.

**Table 5.3. Drying Kiln Emissions Limits**

Source Description	PM <sub>10</sub>	VOC
	T/yr	T/yr
Lumber Drying Kilns 1 through 7 combined emissions	3.94	110.3

[PTC No. P-2007.0107, 01/17/11]

- 5.2 In accordance with IDAPA 58.01.01.702, the permittee shall not discharge into the atmosphere from any source operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 17,000 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12(PW)^{0.27}$$

[PTC No. P-2007.0107, 01/17/11]

- 5.3 In accordance with IDAPA 58.01.01.701, the permittee shall not discharge to the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 9,250 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 9,250 pounds per hour,

$$E = 1.10(PW)^{0.25}$$

[PTC No. P-2007.0107, 01/17/11]

## Operating Requirements

### 5.4 Throughput Limits-Kilns 1 through 7 Combined

The throughput through Kilns 1 through 7 combined shall not exceed 157,585 thousand board feet (lumber scale) in any consecutive 12-calendar months.

[PTC No. P-2007.0107, 01/17/11]

### 5.5 Temperature Monitoring – Kilns 1 through 7

The permittee shall install, calibrate, maintain, and operate a device on each kiln to measure and record the kiln temperature.

[PTC No. P-2007.0107, 01/17/11]

## Monitoring and Recordkeeping Requirements

### 5.6 Throughput Monitoring by Wood Species

Each month, the permittee shall monitor and record the combined throughput of Kilns 1 through 7 in board feet (lumber scale) for each species of wood processed and the total of all wood species processed for that month and for the most recent consecutive 12-calendar month period.

[PTC No. P-2007.0107, 01/17/11]

### 5.7 HAPs Monitoring

The permittee shall calculate and record the emissions of methanol and total HAPs from all of the lumber drying kilns on a monthly basis, in units of tons per month and tons for the most recent consecutive 12-calendar month period. These totals shall be combined with the methanol and total HAPs emissions from the hog-fuel boiler for the same period to demonstrate compliance with the facility-wide HAPs limits. HAPs emissions from the kilns shall be calculated using the equation given below and the emission factors listed in Table 5.4. If at any time during the drying time for each load, the temperature is equal to or greater than 200°F, the factor for > 200°F shall be used to calculate emissions for that load. Use of alternate emission factors requires prior DEQ approval.

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

Where:

- HAP = Kiln Emissions of a specific HAP or total HAP in tons per month  
 n = Number of types of wood dried  
 X<sub>i</sub> = Throughput of lumber of type i dried in all kilns in thousand board feet (MBF) per month  
 Y<sub>i</sub> = HAP emission factor for lumber of type i

Table 5.4 Kiln HAP Emission Factors

Wood Species	Max. KilnTemp	Methanol (lb/Mbf)	Total HAP (lb/Mbf)
Douglas Fir	< 200 °F	0.038	0.097
Douglas Fir	> 200 °F	0.057	0.116
White Fir	< 200 °F	0.122	0.1824
White Fir	> 200 °F	0.183	0.2434
Ponderosa Pine	< 200 °F	0.065	0.1135
Ponderosa Pine	> 200 °F	0.144	0.1889
Lodgepole Pine	< 200 °F	0.055	0.0736

Lodgepole Pine	> 200 °F	0.060	0.0786
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[PTC No. P-2007.0107, 01/17/11]

## 5.8 Temperature Monitoring

Once each hour, the permittee shall monitor and record the temperature of each kiln during normal drying operations (for any day that that kiln is in use) to determine the correct HAP emission factor to use for calculating emissions. Alternatively, in lieu of tracking temperature, the higher emission factor shall be used to calculate emissions.

[PTC No. P-2007.0107, 01/17/11]

## 6. Woodworking Equipment

### Summary Description

Woodworking equipment includes the sawmill and the two planing mills.

Heavy sawdust from the sawmill is transferred by conveyor (TR8) to a sawdust cyclone (P7) or sawdust cyclone target box (P21). Material collected from the P7 sawdust cyclone is conveyed to the hog-fuel boiler. Material collected from the P21 target box is loaded into the sawdust truck bin (ST2) with a bottom drop to trucks (TR14).

Light sawdust from the sawmill is routed first through a baghouse (P24) and then to a baghouse cyclone (P6). Material collected in the baghouse cyclone is conveyed to the hog-fuel boiler.

Shavings from the old and new planing mills are collected in shavings cyclones (P11) and (P12), respectively. The collected material from these two cyclones is conveyed to shavings cyclone (P14) or to shavings cyclone (P13). Material collected from P14 is conveyed to the hog-fuel boiler. Material collected from P13 is loaded into the truck shavings bin (ST6) with a bottom drop to trucks (TR16).

Table 6.1 describes the devices used to control emissions from the sawmill.

**Table 6.1. Sawmill, and Planing Mills Description**

Emissions Units / Processes	Control Devices
Sawmill	Cyclones, baghouses, target box

Table 6.2 contains only a summary of the requirements that apply to the woodworking equipment. 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, 6.2	Particulate matter	Equation	IDAPA 58.01.01.702, IDAPA 58.01.01.701, PTC No. P-2007.0107 (01/17/2011)	6.3, 6.4, 6.5

### Emission Limits

**6.1** In accordance with IDAPA 58.01.01.702, the permittee shall not discharge into the atmosphere from any source operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 17,000 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12(PW)^{0.27}$$

[PTC No. P-2007.0107, 01/17/11]

**6.2** In accordance with IDAPA 58.01.01.701, the permittee shall not discharge into the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 9,250 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 9,250 pounds per hour,

$$E = 1.10(PW)^{0.25}$$

[PTC No. P-2007.0107, 01/17/11]

## Operating Requirements

### 6.3 Operation of cyclones and baghouse/filter systems

The permittee shall install and operate cyclones and baghouse/filter system(s) to control emissions from woodworking equipment at this facility.

[PTC No. P-2007.0107, 01/17/11]

### 6.4 Cyclone and Baghouse/Filter System Procedures

The permittee shall have developed a Cyclone and Baghouse/Filter System Procedures document regarding the inspection and operation of the cyclones and baghouses/filter system(s) which controls the PM and PM<sub>10</sub> emissions from woodworking equipment at this facility. The document shall describe the procedures that will be followed to comply with good working order and efficient operating practices, and shall contain, at a minimum, requirements for monthly inspections of the cyclones and baghouse(s). The inspection procedures shall include, but not be limited to:

- A visible emissions observation while operating;
- If visible emissions are present the opacity of the visible emissions shall be determined in accordance with procedures contained in IDAPA 58.01.01.625;
- Checking the bags or cartridges for structural integrity; and
- Checking to assure that bags or cartridges are appropriately secured in place.

The Baghouse/Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if:

- Visible emissions are determined to be 10% opacity or greater;
- Bags or cartridges are ruptured; or
- Bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of the baghouse/filter system inspection in accordance with monitoring and recordkeeping permit condition. The records shall include a description of any corrective action that was taken, whether visible emissions were present, and if visible emissions were present the results of visible emission observation as determined by procedures contained in IDAPA 58.01.01.625.

Any changes to the Cyclone and Baghouse/Filter System Procedures document shall be submitted within 15 days of the change. The Cyclone and Baghouse/Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-2007.0107, 01/17/11]

## **Monitoring and Recordkeeping Requirements**

- 6.5** The operating and monitoring requirements specified in the Cyclone and Baghouse/Filter System Document are incorporated by reference to this permit and are enforceable permit conditions.

[PTC No. P-2007.0107, 01/17/11]

## 7. Compression Ignition Emergency Internal Combustion Engine

### Summary Description

- 7.1 The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart ZZZZ and all applicable general provisions of 40 CFR 63 Subpart A.

Subpart ZZZZ applies to the existing stationary Reciprocating Internal Combustion Engine (RICE) located at area source of HAP emissions. Subpart ZZZZ applies to the existing emergency compression ignition engine with a rated capacity of 270 bhp. Bennett Lumber Products maintains a John Deere, 6081AF001, 270 bhp compression ignition engine onsite for emergency purposes.

### Compliance Date

- 7.2 In accordance with 40 CFR 63.6595(a)(1), the affected source must comply with the applicable emission and operating limitations of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ by May 3, 2013.

[40 CFR 63.6595(a)(1); PTC No. P-2007.0107, 01/17/11]

### Emissions and Operating Limitations

- 7.3 In accordance with 40 CFR 63.6603(a), on and after May 3, 2013, the following emission limits or operating restrictions are required for the engine. The permittee must meet the following requirements, except during periods of startup.

- Change oil and filter every 500 hours of operation or annually, whichever comes first.
- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6603(a); PTC No. P-2007.0107, 01/17/11]

- 7.4 On and after May 3, 2013, the permittee shall operate and maintain the diesel engine(s) and associated pollution control equipment (where applicable) in a manner that minimizes emissions. Nothing further is required to reduce emissions other than what is necessary to meet the appropriate limitation in the Emissions Limitations permit condition in accordance with 40 CFR 63.6605.

[40 CFR 63.6605; PTC No. P-2007.0107, 01/17/11]

### Monitoring and Recordkeeping Requirements

- 7.5 In accordance with 63.6625(e)(3) and Table 6 of the subpart, on and after May 3, 2013, the permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your 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 for minimizing emissions.

[40 CFR 63.6625(e)(3); PTC No. P-2007.0107, 01/17/11]

7.6 In accordance with 63.6625(f), on and after May 3, 2013, an existing emergency stationary RICE located at an area source of HAP emissions must install a non-resettable hour meter if one is not already installed.

[40 CFR 63.6625(f); PTC No. P-2007.0107, 01/17/11]

7.7 On and after May 3, 2013, the engine's time spent at idle during startup shall be minimized to a period needed for appropriate and safe loading of the engine, but not to exceed 30 minutes, after which time the emission standards associated with this permit apply in accordance with 40 CFR 63.6625(h).

[40 CFR 63.6625(h); PTC No. P-2007.0107, 01/17/11]

7.8 In accordance with 40 CFR 63.6625(i), on and after May 3, 2013, the permittee has the option of implementing an oil analysis program to extend the specified oil change frequency in the Emissions and Operating Limitations permit condition. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil before continuing to use the engine. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

[40 CFR 63.6625(i); PTC No. P-2007.0107, 01/17/11]

7.9 In accordance with 40 CFR 63.6640(f), the permittee must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

- (ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
  - (iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
- (3) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
- (4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
- (i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.
  - (ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:
    - (A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.
    - (B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.
    - (C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.
    - (D) The power is provided only to the facility itself or to support the local transmission and distribution system.
    - (E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

[40 CFR 63.6640(f)]

## Reporting Requirements

- 7.10** In accordance with 40 CFR 63.6655(e), the permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following RICE; (1) an existing stationary emergency RICE, (2) an existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

In accordance with 40 CFR 63.6655(f), an existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If engines are used for demand response, the permittee must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

All records shall be readily accessible in hard copy or electronic form for a minimum of five (5) years after the date of each occurrence, measurement, maintenance procedure, corrective action or report in accordance with 40 CFR 63.6660.

[40 CFR 63.6655(e), 63.6660; PTC No. P-2007.0107, 01/17/11]

## 8. RESERVED

## 9. Insignificant Activities

9.1 Table 9.1 lists the units or activities that are insignificant on the basis of size or production rate. The regulatory citation for units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

**Table 9.1. Insignificant Activities**

All Sources Listed Below are Insignificant Activities in accordance with IDAPA 58.01.01.317.01.b			
Truck bark bin	Truck sawdust bin	Truck chip bin	Boiler fuel storage
Auxiliary fuel bin	Shavings truck bin	Log yard waste 1	Log yard waste 2
Rock storage	Ash storage	Hog fuel in-feed conveyor	Bark conveyor system
Hog fuel out-feed conveyor	Bark screen oversize	Deck trash conveyor	Truck bark bin conveyor
Boiler bark conveyor	Sawdust conveyor-vibrator	Chip oversize conveyor	Main fuel conveyor
Auxiliary fuel bin conveyor	Flyash transport	Small log debarker	Large log debarker
Bark hog	Bark screen	Chip screen	20,000-gallon diesel fuel tank 1
2,000-gallon gasoline tank	2,500 gallon diesel fuel tank	1,000-gallon stove oil tank	20,000-gallon diesel fuel tank 2
30-gallon parts washer 1	30-gallon parts washer 2	30-gallon parts washer 3	2,000-gallon aviation fuel tank
1,000-gallon used oil tank	2,000 cubic yard rock storage		

9.2 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in facility-wide permit conditions of this permit.

## 10. General Provisions

### General Compliance

- 10.1 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)]

- 10.2 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)]

- 10.3 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

- 10.4 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)]

- 10.5 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

- 10.6 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

- 10.7 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)]

- 10.8 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

- 10.9 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

- 10.10 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)]

- 10.11 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

- 10.12 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)]

- 10.13 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

- 10.14 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**

**10.15** 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**

**10.16** 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**

**10.17** 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**

**10.18** 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)]

**10.19** 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**

**10.20** 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

**10.21** 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

**10.22** 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 1 to December 31 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.

**10.23** 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**

**10.24** 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**

**10.25** 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**

**10.26** 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 1 to June 30 and July 1 to December 31. 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**

**10.27** 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**

**10.28** 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**

**10.29** 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)]