Statement of Basis

Tier I Operating Permit No. T1-2011.0121

Project ID 62127

Tamarack Mill, LLC dba Evergreen Forests and Tamarack Energy Partnership

New Meadows, Idaho

Facility ID 003-00001

Final

December 11, 2018

Christina Boulay

Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

Table of Contents

1. Acronyms, Units and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HAP	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO_2	sulfur dioxide
SO_x	sulfur oxides
Tier I	Tier I operating permit
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound
QIP	Quality Improvement Plan

2. INTRODUCTION AND APPLICABILITY

Tamarack Mills, LLC dba Evergreen Forest and Tamarack Energy Partnership (Tamarack Mills) is a manufacturer of dry kiln lumber and cogeneration of energy, and is located at New Meadows. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit PM_{10} and CO above the major source threshold of 100 tons-per-year. At the time of this permitting action, the facility is not a major source of HAP emissions. As a major facility, Tamarack Mills is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from Tamarack Mills as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for Tamarack Mills.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

Tamarack Mills Tier I operating permit is organized into sections. They are as follows:

Section 1- Acronyms, Units, and Chemical Nomenclature

Section 1 states the full name of the acronyms, units, and chemical nomenclature stated within the permit.

Section 2 – Tier I Operating Permit Scope

The scope describes this permitting action.

Section 3 – Facility-Wide Conditions

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

Sections 4 through 7 – Emissions Unit/Source Name

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

Section 8 – Compliance Assurance Monitoring

A compliance assurance monitoring plan states the monitoring required by the facility to assure the unit subject to a CAM plan is operating within compliance.

Section 9 – Non-applicable Requirements and Insignificant Activities

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

Section 10 – General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

3. FACILITY INFORMATION

3.1 Facility Description

Tamarack Mills facility is located approximately 6 miles SW of New Meadows, Idaho on Highway 95. Tamarack Energy Partnership is a topping cycle cogeneration facility. Evergreen Forest's sawmill processes logs into green dimensional lumber. The green dimensional lumber is dried in kilns. The facility processes approximately 35% white fir, 35% Douglas fir, 15% ponderosa pine, 10-15% lodge pine, and 0-5% larch or spruce. Wood waste is burned to produce steam in a water wall boiler. Steam from the boiler is piped to a turbine which powers an electrical generator. After steam from the biomass-fired boiler passes through the electrical generation process, it will be supplied to the lumber drying kilns (No. 1 through 6). The facility sells energy to Idaho Power Company.

3.2 Facility Permitting History

3.2.1 Tier I Operating Permit History – Previous 5-year permit term 2014 to 2019

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from 2014 to 2019. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

November 21, 2014	Tier 1 operating permit renewal for T1-2011.0121 (A, will be S upon issuance of this permit).

3.2.2 Underlying Permit History – Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

September 1, 1980	Operating Permit No. 13-0040-0001-00 was issued to Evergreen Forest Products. The permit cover letter states that the permit governs the operations of the sawmill. However, the only emission units included in the permit are a conical wood waste incinerator and three wood-fired boilers, none exist today at the facility.
December 30, 1982	A letter was issued to Tamarack Energy that serves as the permit to construct for the "wood residue-fired cogeneration unit". The only emission limits in the permit are 20% opacity and the grain-loading standard for fuel-burning equipment (0.080 grains per dry cubic foot of effluent gas corrected to 8% oxygen).
October 31, 1996	A Director's exemption was issued to Yanke Energy, Tamarack's consultant, for the temporary burning of scrap railway ties.
July 3, 2001	DEQ approves burning of scrap wood in the cogeneration boiler. Approximately 3,000 tons of scrap wood will be received from the Jaype Plywood facility in Pierce, Idaho.
September 17, 2002	DEQ issued Tamarack a Tier I Operating Permit. (S)
February 6, 2003	DEQ issued an administrative amended Tier I Operating Permit.(S)
February 7, 2007	T1-050009 Tier I renewal(S)

July 27, 2007	Tier II/PTC T2-050047 fulfilled requirements of Compliance Schedule of Tier I operating permit.(S)
March 27, 2009	T1-2007.0161 Tier I amendment incorporated T2-050047 (S)
November 4, 2009	P-2009.0064, construction of three drying kilns (S)
May 31, 2011	P-2009.0064 project 60856 a PTC revision to combine PTC P-2009.0064 and Tier II/PTC T2-050047(S)
December 13, 2013	P-2009.0064 Project 61224, modification for construction of three (3) additional kilns (A)

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

4.1 Application Scope

This permit is a minor modification of the currently effective Tier I Operating Permit. The applicant has requested to change the indicator range from (5.2-9.0) inches of water to (4.5-9.0) inches of water on the I.D. Fan Outlet (Heat Exchanger/Scrubber Inlet) Pressure in the facilities Compliance Assurance Monitoring Plan. The facility submitted the results from an IDEQ approved source test, IDEQ Technical Services and the Boise Regional Office approved the results, to lower the indicator range. This permit will incorporate the permitting action of P-2009.0064 project No. 61224 issued December 13, 2013. This permit will incorporate and supersede the Tier I renewal permit T1-2011.0121 issued on November 14, 2014.

4.2 Application Chronology

October 5, 2018	DEQ received an application.
October 19, 2018	DEQ determined the application was complete.
October 22, 2018	DEQ notified EPA and Affected State and provided them with the application in according to IDAPA 58.01.01.383.03.
October 24, 2018	DEQ made available the draft permit and statement of basis for peer and regional review.
October 31, 2018	DEQ made available the draft permit and statement of basis for applicant review.
December 11, 2018	DEQ issued the final permit and statement of basis.

5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

5.1 Process No. 1 – Yanke Energy Hog Fuel Boiler (Riley)

Table 5.1 lists the emissions units and control devices associated with Yanke Energy Hog Fuel Boiler (Riley).

Table 5.1 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Yanke Energy Hog Fuel Boiler (Riley)	Multiclone and Wet Scrubber	Boiler Stack

The Tamarack Energy Partnership Cogeneration Unit produces electricity from a stream-powered turbine. Steam is produced in a biomass-fired boiler. A multiclone and wet scrubber control particulate matter emissions from the boiler. Ash collected from the boiler, multiclone and scrubber is landfilled onsite. Table 5.1 describes the devices used to control emissions from the Yanke Energy Hog Fuel boiler (Riley Boiler). The Riley boiler is an industrial boiler operating an area source of hazardous air pollutants (HAPs) subject to 40 CFR 63 subpart JJJJJJ. The requirements of 40 CFR 63 subpart JJJJJJ applicable to Tamarack Mills are new in this permitting action as they apply.

5.2 Process No. 2 – Sawdust Target Box And Chip Target Box (St-3/4)

Table5.2 lists the emissions units and control devices associated with sawdust target box and chip target box (St-3/4)

Table 5.2 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Sawdust target box	None	Vent
Chip target box	None	Vent

In the sawmill building, the sawdust and wood trimmings are collected and separated by various types of equipment. The collected sawdust is pneumatically transferred to a target box. The collected wood trimmings go through a chipper. The chips are pneumatically transferred to a target box. Each target box has a vent to the atmosphere. Table 5.2 describes the devices used to control emissions from Sawdust Target Box and Chip Target Box (ST-3/4).

5.3 Process No. 3 Emergency Internal Combustion Engine

Table 5.3 lists the emissions units and control devices associated with the emergency internal combustion engine.

Table 5.3 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Emergency internal combustion engine	None	Engine exhaust stack

A 150 horsepower diesel-fired internal combustion engine is used to operate a fire pump in case of a fire emergency. The engine is started periodically and run for short periods of time as part of a general maintenance program. Table 5.3 describes the devices used to control emissions from the Emergency Internal Combustion Engine. The internal combustion engine is subject to the maintenance and reporting requirements of 40 CFR 63, subpart ZZZZ beginning May 3, 2013. The requirements of 40 CFR 63 subpart ZZZZ applicable to Tamarack Mills are included in this permitting action as they apply.

5.4 Process No. 4 – Lumber Drying Kilns (No. 1, 2, 3, 4, 5, and 6)

Table 5.4 lists the emissions units and control devices associated with lumber drying kilns (No. 1 through 6).

Table 5.4 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Lumber drying kiln (No.1 through 6)	None	Kilns vents

Six Wellons double-track lumber drying kilns (No. 1, 2, 3, 4, 5, and 6) are located to the southeast side of the Tamarack Mill, LLC facility for drying of green lumber. After steam from the biomass-fired boiler passes through the electrical generation process, it is supplied to the Lumber Drying Kilns (No. 1 through 6). Table 5.4 describes the devices used to control emissions from the Lumber Drying Kilns (No. 1through 6).

5.5 Insignificant Emissions Units Based On Size Or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 5.5 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

Table 5.5 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit/Activity	Regulatory Authority/Justification
Bark blow line	30
Horizontal Resaw	30
Quad Saw	30
Gang Saw	30
Double Arbor Gang Saw	30
Vertical Resaw	30
Double Cut Headrig	30
Double Cut Saw	30
Trim saw	30
Operation, loading and unloading of storage tanks and storage vessels, with lids or other appropriate closure and less than 260 gallon capacity, 35 cubic feet, heated only to the minimum extent to avoid solidification if necessary	1
Operation, loading and unloading of storage tanks, not greater than 1,100 gallon capacity, with lids or other appropriate closure, not for use with hazardous air pollutants, max. vapor pressure of 550mmHg	2
Welding using not more than one ton per day of welding rod	9
Water cooling towers and ponds, not using chromium-based corrosion inhibitors, not used with barometric jets or condensers, not greater than 10,000 gpm, not in direct contact with gaseous or liquid process streams containing regulated air pollutants	13
Municipal and industrial water chlorination facilities of not greater than 20,000,000 gallons per day capacity. The exemption does not apply to waste water treatment.	16
Surface coating using less than two gallons per day	17
Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than 5 MMBtu/hr	18
Milling and grinding activities, using paste-form compounds with less than one percent volatile organic compounds	22
Surface coating, aqueous solution or suspension containing less than one percent volatile organic compounds27	25

Table 5.5 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION (con't)

Emissions Unit/Activity	Regulatory Authority/Justification
Storage and handling of water-based lubricants for 30metal working where the organic content of the lubricant is less than 10%	27
Two 2,000-gallon 12% bleach tanks, which are an emission unit or activity with potential emissions less than or equal to the significant emission rate as defined in Section 006 and actual emissions less than or equal to 10% of the levels contained in Section 006 of the definition of significant and no more than one ton per year of any hazardous air pollutant	30

Non-Applicable Requirements For Which A Permit Shield Are Requested

This section of the permit lists the regulations for which the facility has requested, and DEQ proposes to grant, a permit shield pursuant to IDAPA 58.01.01.325. The findings on which this shield is based are presented below:

Requirements for Which a Permit Shield Will Be Granted

No permit shield was requested and no permit shield was granted.

Requirements for Which a Permit Shield Will Not Be Granted

No permit shield was requested and no permit shield was granted.

5.6 Emissions Inventory

Table 5.6 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

Listed in Table 5.6 is an estimate of the emissions for the regulated sources. The documentation for this emission table were provided in prior issued permits to construct and Tier I operating permitting actions. These are the same emission values used in the prior Tier I operating permits except for the kilns emissions which were address in the PTC for the kilns (P-2009.0064 12/13/13).

Table 5.6 EMISSIONS INVENTORY – POTENTIAL TO EMIT (T/yr)

Emissions Unit Description	PM_{10}	NO_X	SO_2	CO	VOC	HAP
Riley Boiler	77.4	88.0	10	242	6.8	---
Sawdust and Chip Target Boxes	3.36	---	---	---	---	---
Emergency Internal Combustion Engine	0.83	0.16	0.78	0.25	0.93	---
Lumber Drying Kilns (No.1 through 6)	1.9	---	---	---	60.4	5.9
TOTAL EMISSIONS	**82.67**	**88.0**	**10**	**242**	**67.2**	**5.9**

6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Yanke Energy Hog Fuel Boiler (Riley) Emissions Limits;
- Sawdust and Chip Target Boxes Emissions Limits;
- Emergency Internal Combustion Engine Emissions Limits;
- Lumber Drying Kilns (No. 1, 2 and 3) Emissions Limits; and
- Tier I Operating Permit General Provisions.

MRRR

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, describe why and how the condition was changed. See instructions on the cover page for Appendix D for other options.

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the MRRR for the facility-wide permit conditions has been paraphrased. Refer to the permit for the complete requirement.

6.1 Facility-wide Conditions

None of the facility-wide conditions changed. For explanation of the permit conditions see statement of basis for T-1.2011.0121 issued November 21, 2014.

6.2 Emissions Unit-specific Emissions Limits and MRRR

Emissions Unit No. 1- Riley Boiler

For explanation of other permit conditions see statement of basis for T1-2011.0121 issued November 21, 2014.

Permit Condition 4.14

Wet Scrubber Parametric Monitoring

The permittee shall monitor and record daily and while the boiler is operating, the pressure drop across the wet scrubber and the scrubbing media flow rate to the wet scrubber. Records of this information shall be maintained in accordance with the Recordkeeping General Provision.

MRRR - (permit Condition 4.14)

The required monitoring of the pressure drop across the wet scrubber and scrubbing media flow rate to the wet scrubber provides assurance the facility is operating within the parameters of the CAM plan and in compliance with the other permit conditions of this permit. This permit condition has been revised to support the permit condition in the underlying PTC P-2009.0064, during the last Tier I renewal the scrubbing media flow rate monitoring was inadvertently left off of this permit condition.

Permit Condition 4.20

PM/PM_{10} Performance Test

This condition was revised to require a PM/PM_{10} performance test with three (3) runs in the event after issuance of this permit the facility requests to change the CAM ranges. The three runs shall be at the requested CAM range and submitted to IDEQ to verify the facility can continue to demonstrate compliance at the expanded lower end of the scrubber operating range.

- A PM/PM_{10} performance test shall be conducted no later than August 16, 2012 and at least once every five years thereafter, the permittee shall conduct a performance test to measure PM/PM_{10} emissions from the boiler stack at a scrubber pressure drop range of 5.0 inches or less of H_2O.. The test shall be conducted to demonstrate compliance with the emission rate limits specified by the emission limits and fuel-burning equipment PM standard permit conditions. Each performance test conducted to demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157. Compliance with the daily emissions limit shall be determined by multiplying the average hourly PM_{10} emissions rate measured during the performance test by 24.
- All performance testing shall be conducted in accordance with the Performance Testing in the facility-wide conditions of this permit.
- If the PM/PM_{10} test results are below 75% of the PM_{10} emissions limits listed in the emission limits and fuel-burning equipment PM standard permit conditions, the permittee shall conduct a PM_{10} performance test on the boiler stack at least once every five years from the issuance date of this permit. If the test results are greater than 90% of the PM_{10} emissions limits listed in the emission limits and fuel-burning equipment pm standard permit conditions, the permittee shall conduct a PM_{10} performance test on the boiler stack annually. If the test results are between 75% and 90% of the PM_{10} emissions limits listed in the emission limits and fuel-burning equipment PM standard permit conditions, the permittee shall conduct a PM_{10} performance test on the boiler stack at least once every three years from the issuance date of this permit.

MRRR - (permit Condition 4.20)

This permit condition states strongly the need of compliance test protocol 30 days prior to a compliance test. This is helpful for all parties to establish credibility of the test.

40 CFR 64 – Compliance and Assurance Monitoring

This section is designed to demonstrate the parameters of operations for the air pollution control device(s) that demonstrated continued compliance with the conditions of the permit regarding the boiler.

Permit Condition 8.1

In accordance with 40 CFR 64.7(a), the permittee shall conduct the monitoring required under this permit upon issuance.

The permittee requested to change the ID Fan Outlet indicator range from 5.2 to 9.0 inches of water to 4.5 to 9.0 inches of water. IDEQ is approving this change based on the test results from the June 20, 2018, source test, and the manufacture specification sheet attached to the facilities operating and maintenance manual. Both documents indicate the facility would be in compliance with a scrubber pressure drop of 4.5 inches of water.

MRRR – (Permit Condition 8.1)

This permit condition is self-explanatory.

Permit Condition 8.2

In accordance with 40 CFR 64.7(b), at all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

MRRR – (Permit Condition 8.2)

This permit condition states Tamarack is to maintain necessary part for the routine repairs of monitoring equipment used to demonstrate continuous compliance with the permit conditions.

Permit Condition 8.3

In accordance with 40 CFR 64.7(c), except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the Yanke Energy Hog-Fuel Boiler is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of CAM, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

MRRR – (Permit Condition 8.3)

This permit condition defines monitoring malfunction. This permit condition instructs Tamarack the data obtained during the malfunctioning period can’t be used to satisfy the purposed of CAM.

Permit Condition 8.4

In accordance with 40 CFR 64.7(d), upon detecting an excursion or exceedance, the permittee shall restore operation of the Yanke Energy Hog-Fuel Boiler (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

MRRR – (Permit Condition 8.4)

This permit condition instructs Tamarack when an excursion or exceedance occurs Tamarack is to restore the operation to its normal operation manner as expeditiously as practicable. This permit condition instructs Tamarack with possibilities to reduce the possibility of Tamarack operating outside of the ranges stated with this permit to demonstrate compliance.

Permit Condition 8.5

In accordance with 40 CFR 63(b), for the multiclone in series with a wet scubber, if the manufacturer specifications for the monitoring devices for the pressure drop and heat exchanger include calibration procedures but do not specify a calibration frequency, the device shall be calibrated at least once each calendar year.

MRRR – (Permit Condition 8.5)

This permit condition specifies the appropriate frequency that calibration shall be performed on the monitoring devices used to demonstrate compliance with the permit conditions stated in the permit.

Permit Condition 8.6

In accordance with 40 CFR 64.6(c)(2), an exceedance shall be defined as any measured emission of Pollutant PM_{10} which exceeds any corresponding emissions limit specified for the emissions unit in the permit.

MRRR – (Permit Condition 8.6)

The means by which the owner or operator will define an exceedance or excursion for purposes of responding to and reporting exceedances or excursions under sections 64.7 and 64.8 of this part. The permit shall specify the level at which an excursion or exceedance will be deemed to occur, including the appropriate averaging period associated with such exceedance or excursion. For defining an excursion from an indicator range or designated condition, the permit may either include the specific value(s) or condition(s) at which an excursion shall occur, or the specific procedures that will be used to establish that value or condition. If the latter, the permit shall specify appropriate notice procedures for the owner or operator to notify the permitting authority upon any establishment or reestablishment of the value. These values were submitted by Tamarack as the appropriate values for determining continuous compliance with the permit conditions.

Permit Condition 8.7

In accordance with 40 CFR 64.7(e), if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this operating permit to address the necessary monitoring changes. Such a modification may include, but is

not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

MRRR – (Permit Condition 8.7)

Permit condition 8.7 addresses the issue if or when Tamarack fails to achieve compliance with the emission limit or standard set by this permit. This permit condition provides various methods that exceedances or excursions can be addressed to provide the facility method to demonstrate compliance with all permit conditions as stated in the permit.

Permit Condition 8.8

In accordance with 40 CFR 64.8(a), the permittee shall develop and implement a quality improvement plan (QIP) if an accumulation of exceedances or excursions exceeds 5 percent duration of Yanke Energy Hog-Fuel Boiler's operating time for a reporting period.

MRRR – (Permit Condition 8.8)

Permit condition 8.8 states the procedure required if or when Tamarack's accumulation of exceedances or excursions exceeds 5 percent duration of the boiler's operating time for a reporting period.

Permit Condition 8.9

In accordance with 40 CFR 64.9(a)(2), the reports required by the Semiannual Monitoring Reports and Reporting Deviations and Excess Emissions General Provisions shall include the following information for those emissions units listed in Table 11.1:

- Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).

MRRR – (Permit Condition 8.9)

Permit condition 7.9 contains the informational data required in the reports for Tamarack to demonstrate compliance with the regulation of 40 CFR 64.9(a)(2).

Permit Condition 8.10

In accordance with 40 CFR 64.9(b), the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

MRRR – (Permit Condition 8.10)

Permit condition 8.10 contains the informational data required in the records for Tamarack to demonstrate compliance with the regulation of 40 CFR 64.9(b).

Permit Condition 8.11

Should there be a conflict between the requirements of 40 CFR 64 and any of the CAM permit conditions of this permit, the requirements of the 40 CFR 64 shall govern, including any amendments to that regulation.

MRRR – (Permit Condition 8.11)

Permit condition 8.11 states clearly in case of a conflict with the federal regulation within 40 CFR 64 and any CAM permit condition the requirements of 40 CFR 64 shall be the governing requirement to demonstrate compliance.

General Provisions

No changes were made to the General Provisions.

7. REGULATORY REVIEW

7.1 Attainment Designation (40 CFR 81.313)

The facility is located in Adams which is designated as attainment or unclassifiable for PM_{10}, $PM_{2.5}$, CO, NO_2, SO_X, and Ozone. Reference 40 CFR 81.313.

7.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit
Post project facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for CO as demonstrated previously in the Emissions Inventories Section of analyses of July 27, 2007, and November 4, 2009. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10.

7.3 PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality
The facility is classified as an existing major stationary source, because the estimated emissions of PM_{10}, SO_2, NO_X, CO, VOC, and HAP have the potential to exceed major stationary source thresholds.

The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a). This facility is not a major source as defined to have potential emissions that exceed 250 tons per year of a criteria pollutant. The PSD classification does not apply to this facility.

7.4 NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements.

7.5 NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

7.6 MACT Applicability (40 CFR 63)

Tamarack has a stationary reciprocating internal combustion engine and an industrial boiler that is an area source for hazardous air pollutants. Thus Tamarack is applicable to standards of 40 CFR 63.

40 CFR 63, Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

- 40 CFR 63, Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

40 CFR 63, Subpart ZZZZ **National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines**

§ 63.6580 What is the purpose of subpart ZZZZ?

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

§ 63.6585 Am I subject to this subpart?

You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

(b) A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site.

(c) An area source of HAP emissions is a source that is not a major source.

(d) If you are an owner or operator of an area source subject to this subpart, your status as an entity subject to a standard or other requirements under this subpart does not subject you to the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) for a reason other than your status as an area source under this subpart. Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart as applicable.

(e) If you are an owner or operator of a stationary RICE used for national security purposes, you may be eligible to request an exemption from the requirements of this subpart as described in 40 CFR part 1068, subpart C.

§ 63.6590 What parts of my plant does this subpart cover?

This subpart applies to each affected source.

(a) Affected source. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

(1) Existing stationary RICE.

(i) For stationary RICE with a site rating of more than 500 brake horsepower (HP) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.

(ii) For stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

(iv) A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

(2) New stationary RICE. (i) A stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after December 19, 2002.

(ii) A stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

(iii) A stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006.

(3) Reconstructed stationary RICE. (i) A stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after December 19, 2002.

(ii) A stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.

(iii) A stationary RICE located at an area source of HAP emissions is reconstructed if you meet the definition of reconstruction in §63.2 and reconstruction is commenced on or after June 12, 2006.

(b) Stationary RICE subject to limited requirements.

(1) An affected source which meets either of the criteria in paragraphs (b)(1)(i) through (ii) of this section does not have to meet the requirements of this subpart and of subpart A of this part except for the initial notification requirements of §63.6645(f).

(i) The stationary RICE is a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions.

(ii) The stationary RICE is a new or reconstructed limited use stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions.

(2) A new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis must meet the initial notification requirements of §63.6645(f) and the requirements of §§63.6625(c), 63.6650(g), and 63.6655(c). These stationary RICE do not have to meet the emission limitations and operating limitations of this subpart.

(3) The following stationary RICE do not have to meet the requirements of this subpart and of subpart A of this part, including initial notification requirements:

(i) Existing spark ignition 2 stroke lean burn (2SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;

(ii) Existing spark ignition 4 stroke lean burn (4SLB) stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;

(iii) Existing emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;

(iv) Existing limited use stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions;

(v) Existing stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;

(vi) Existing residential emergency stationary RICE located at an area source of HAP emissions;

(vii) Existing commercial emergency stationary RICE located at an area source of HAP emissions; or

(viii) Existing institutional emergency stationary RICE located at an area source of HAP emissions.

(c) Stationary RICE subject to Regulations under 40 CFR Part 60. An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

(1) A new or reconstructed stationary RICE located at an area source;

(2) A new or reconstructed 2SLB stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(3) A new or reconstructed 4SLB stationary RICE with a site rating of less than 250 brake HP located at a major source of HAP emissions;

(4) A new or reconstructed spark ignition 4 stroke rich burn (4SRB) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(5) A new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions which combusts landfill or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis;

(6) A new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions;

(7) A new or reconstructed compression ignition (CI) stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions.

§ 63.6595 When do I have to comply with this subpart?

(a) Affected sources.

(1) If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than June 15, 2007. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. If you have an existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

(2) If you start up your new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions before August 16, 2004, you must comply with the applicable emission limitations and operating limitations in this subpart no later than August 16, 2004.

(3) If you start up your new or reconstructed stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions after August 16, 2004, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.

(4) If you start up your new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions before January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart no later than January 18, 2008.

(5) If you start up your new or reconstructed stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions after January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.

(6) If you start up your new or reconstructed stationary RICE located at an area source of HAP emissions before January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart no later than January 18, 2008.

(7) If you start up your new or reconstructed stationary RICE located at an area source of HAP emissions after January 18, 2008, you must comply with the applicable emission limitations and operating limitations in this subpart upon startup of your affected source.

(b) Area sources that become major sources. If you have an area source that increases its emissions or its potential to emit such that it becomes a major source of HAP, the compliance dates in paragraphs (b)(1) and (2) of this section apply to you.

(1) Any stationary RICE for which construction or reconstruction is commenced after the date when your area source becomes a major source of HAP must be in compliance with this subpart upon startup of your affected source.

(2) Any stationary RICE for which construction or reconstruction is commenced before your area source becomes a major source of HAP must be in compliance with the provisions of this subpart that are applicable to RICE located at major sources within 3 years after your area source becomes a major source of HAP.

(c) If you own or operate an affected source, you must meet the applicable notification requirements in §63.6645 and in 40 CFR part 63, subpart A.

§ 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

Compliance with the numerical emission limitations established in this subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this subpart.

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 1b and Table 2b to this subpart that apply to you.

(b) If you own or operate an existing stationary non-emergency CI RICE greater than 300 HP located at area sources in areas of Alaska not accessible by the Federal Aid Highway System (FAHS) you do not have to meet the numerical CO emission limitations specified in Table 2d to this subpart. Existing stationary non-emergency CI RICE greater than 300 HP located at area sources in areas of Alaska not accessible by the FAHS must meet the management practices that are shown for stationary non-emergency CI RICE less than or equal to 300 HP in Table 2d to this subpart.

As stated in §63.6603, you must comply with the following requirements for existing stationary RICE located at area sources of HAP emissions:

Table 2d to Subpart ZZZZ of Part 63 — Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

For Each	You Must Meet the Following Operating Limitation	During periods of startup you must . . .
4. Emergency stationary CI RICE and black start stationary CI RICE.[2]	**a. Change oil and filter every 500 hours of operation or annually, whichever comes first;[1]** **b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;** **c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.**	**Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.**

[1] Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.

[2] If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

Permit Condition 6.3 includes the requirements of this section.

§ 63.6605 What are my general requirements for complying with this subpart?

(a) You must be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times.

(b) 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 which 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.

Permit Condition 6.7 includes the requirements of this section.

§ 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?

(e) If you own or operate any of the following stationary RICE, you 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:

(2) An existing emergency or black start stationary RICE with a site rating of less than or equal to 500 HP located at a major source of HAP emissions;

Permit Condition 6.8 includes the requirements of this section.

(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

Permit Condition 6.8 includes the requirements of this section.

(h) If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

Permit Conditions 6.8 includes the requirements of this section.

(i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning 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 within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. 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.

Permit Conditions 6.8 includes the requirements of this section.

§ 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?

(f) Requirements for emergency stationary RICE. (1) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that was installed on or after June 12, 2006, or an existing emergency stationary RICE located at an area source of HAP emissions, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.

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

(ii) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. 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 year.

(iii) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving 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; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.

Permit Conditions 6.8 includes the requirements of this section.

§ 63.6645 What notifications must I submit and when?

(a) You must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified if you own or operate any of the following;

(2) An existing stationary RICE located at an area source of HAP emissions.

Permit Condition 3.22 includes the requirements of this section.

§ 63.6655 What records must I keep?

(a) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of this section.

(1) A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv).

(2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.

(3) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).

(4) Records of all required maintenance performed on the air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

Permit Conditions 6.10 includes the requirements of this section.

(e) You 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 stationary RICE;

(1) An existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions.

(2) An existing stationary emergency RICE.

(3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator 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 the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

(1) An existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions that does not meet the standards applicable to non-emergency engines.

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

Permit Conditions 6.10 includes the requirements of this section.

§ 63.6660 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1).

Permit Conditions 6.11 includes the requirements of this section.

40 CFR 63, Subpart JJJJJJ **National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources**

§ 63.11193 Am I subpart to this subpart?

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

§ 63.11194 What is the affected source of this subpart?

(a) This subpart applies to each new, reconstructed, or existing affected source as defined in paragraphs (a)(1) and (2) of this section.

(1) The affected source is the collection of all existing industrial, commercial, and institutional boilers within a subcategory (coal, biomass, oil), as listed in §63.11200 and defined in §63.11237, located at an area source.

(2) The affected source of this subpart is each new or reconstructed industrial, commercial, or institutional boiler within a subcategory, as listed in §63.11200 and as defined in §63.11237, located at an area source.

(b) An affected source is an existing source if you commenced construction or reconstruction of the affected source on or before June 4, 2010.

§ 63.11196 What are my compliance dates?

(a) If you own or operate an existing affected boiler, you must achieve compliance with the applicable provisions in this subpart as specified in paragraphs (a)(1) through (3) of this section.

(1) If the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management standard no later than March 21, 2012.

(2) If the existing affected boiler is subject to emission limits, you must achieve compliance with the emission limits no later than March 21, 2014.

(3) If the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014.

(b) If you start up a new affected source on or before May 20, 2011, you must achieve compliance with the provisions of this subpart no later than May 20, 2011.

(c) If you start up a new affected source after May 20, 2011, you must achieve compliance with the provisions of this subpart upon startup of your affected source.

(d) If you own or operate an industrial, commercial, or institutional boiler and would be subject to this subpart except for the exemption in §63.11195(b) for commercial and industrial solid waste incineration units covered by 40 CFR part 60, subpart CCCC or subpart DDDD, and you cease combusting solid waste, you must be in compliance with this subpart on the effective date of the waste to fuel switch.

Permit condition 4.7 and 4.8

§ 63.11200 What are the subcategories of boilers?

The subcategories of boilers are coal, biomass, and oil. Each subcategory is defined in §63.11237.

§ 63.11201 What standards must I meet?

(a) You must comply with each emission limit specified in Table 1 to this subpart that applies to your boiler.

(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 the requirements in Table 2 to this subpart satisfies the energy assessment portion of this requirement.

(c) You must comply with each operating limit specified in Table 3 to this subpart that applies to your boiler.

(d) These standards apply at all times.

Table 2 to Subpart JJJJJJ of Part 63 — Work Practice Standards, Emission Reduction Measures, and Management Practices

For Each	You must meet the following. . .
1. If your boiler is in this subcategory. . .	**Minimize the boiler's startup and shutdown periods following the manufacturer's recommended procedures. If manufacturer's recommended procedures are not available, you must follow recommended procedures for a unit of similar design for which manufacturer's recommended procedures are available.**
2. Existing or new coal (units with heat input capacity of less than 10 million Btu per hour)	**Conduct a tune-up of the boiler biennially as specified in §63.11223.**
3. Existing or new biomass or oil	**Conduct a tune-up of the boiler biennially as specified in §63.11223.**
4. Existing coal, biomass, or oil (units with heat input capacity of 10 million Btu per hour and greater)	**Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. The energy assessment must include:** **(1) A visual inspection of the boiler system,** **(2) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,** **(3) Inventory of major systems consuming energy from affected boiler(s),** **(4) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,** **(5) A list of major energy conservation measures,** **(6) A list of the energy savings potential of the energy conservation measures identified,** **(7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.**

PTC Permit Condition 4.9, 4.12, 4.13, includes the requirements of this section.

§ 63.11205 What are my general requirements for complying with this subpart?

(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.

Permit Condition 4.10, 4.17, 3.23

(b) You can demonstrate compliance with any applicable mercury emission limit using fuel analysis if the emission rate calculated according to §63.11211(c) is less than the applicable emission limit. Otherwise, you must demonstrate compliance using stack testing.

(c) If you demonstrate compliance with any applicable emission limit through performance stack testing and subsequent compliance with operating limits (including the use of continuous parameter monitoring system), with a CEMS, or with a COMS, you must develop a site-specific monitoring

plan according to the requirements in paragraphs (c)(1) through (3) of this section for the use of any CEMS, COMS, or continuous parameter monitoring system. This requirement also applies to you if you petition the EPA Administrator for alternative monitoring parameters under §63.8(f).

(1) For each continuous monitoring system required in this section (including CEMS, COMS, or continuous parameter monitoring system), you must develop, and submit to the delegated authority for approval upon request, a site-specific monitoring plan that addresses paragraphs (c)(1)(i) through (vi) of this section. You must submit this site-specific monitoring plan, if requested, at least 60 days before your initial performance evaluation of your CMS. This requirement to develop and submit a site specific monitoring plan does not apply to affected sources with existing monitoring plans that apply to CEMS and COMS prepared under appendix B to part 60 of this chapter and which meet the requirements of §63.11224.

(i) Installation of the continuous monitoring system sampling probe or other interface at a measurement location relative to each affected process unit such that the measurement is representative of control of the exhaust emissions (e.g., on or downstream of the last control device);

(ii) Performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems; and

(iii) Performance evaluation procedures and acceptance criteria (e.g., calibrations).

(iv) Ongoing operation and maintenance procedures in accordance with the general requirements of §63.8(c)(1)(ii), (c)(3), and (c)(4)(ii);

(v) Ongoing data quality assurance procedures in accordance with the general requirements of §63.8(d); and

(vi) Ongoing recordkeeping and reporting procedures in accordance with the general requirements of §63.10(c) (as applicable in Table 8 to this subpart), (e)(1), and (e)(2)(i).

(2) You must conduct a performance evaluation of each CMS in accordance with your site-specific monitoring plan.

(3) You must operate and maintain the CMS in continuous operation according to the site-specific monitoring plan.

Permit Condition 4.11

§63.11214 How do I demonstrate initial compliance with the work practice standard, emission reduction measures, and management practice?

(a) If you own or operate an existing or new coal-fired boiler with a heat input capacity of less than 10 million Btu per hour, 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.

(b) If you own or operate an existing or new biomass-fired boiler or an existing or new oil-fired boiler, 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.

(c) If you own or operate an existing affected boiler with a heat input capacity of 10 million Btu per hour or greater, you must submit a signed certification in the Notification of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 to this subpart and is an accurate depiction of your facility.

(d) If you own or operate a boiler subject to emission limits in Table 1 of this subpart, you must minimize the boiler's startup and shutdown periods following the manufacturer's recommended

procedures, if available. If manufacturer's recommended procedures are not available, you must follow recommended procedures for a unit of similar design for which manufacturer's recommended procedures are available. You must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available.

Permit Conditions 4.22 and 4.23

§63.11225 What are my notification, reporting, and recordkeeping requirements?

(a) You must submit the notifications specified in paragraphs (a)(1) through (5) of this section to the administrator.

(1) You must submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of this section.

(2) An Initial Notification must be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard.

(3) If you are required to conduct a performance stack test you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance stack test is scheduled to begin.

(4) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196 unless you must conduct a performance stack test. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official.

(i) You must submit the information required in §63.9(h)(2), except the information listed in §63.9(h)(2)(i)(B), (D), (E), and (F). If you conduct any performance tests or CMS performance evaluations, you must submit that data as specified in paragraph (e) of this section. If you conduct any opacity or visible emission observations, or other monitoring procedures or methods, you must submit that data to the Administrator at the appropriate address listed in §63.13.

(ii) “This facility complies with the requirements in §63.11214 to conduct an initial tune-up of the boiler.”

(iii) “This facility has had an energy assessment performed according to §63.11214(c).”

(iv) For units that install bag leak detection systems: “This facility complies with the requirements in §63.11224(f).”

(v) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.”

(vi) The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written Notification of Compliance Status must be submitted to the Administrator at the appropriate address listed in §63.13.

(5) If you are using data from a previously conducted emission test to serve as documentation of

conformance with the emission standards and operating limits of this subpart, you must include in the Notification of Compliance Status the date of the test and a summary of the results, not a complete test report, relative to this subpart.

(b) You must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of this section. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section. For boilers that are subject only to a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section.

(1) Company name and address.

(2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(i) "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."

(ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."

(iii) "This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

(3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

(4) The total fuel use by each affected boiler subject to an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under §241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of §241.3, and the total fuel usage amount with units of measure.

(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.

(ii) For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1) of this chapter, you must keep a record which documents how the secondary material meets each of the legitimacy criteria

under §241.3(d)(1). If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4) of this chapter, you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2 and each of the legitimacy criteria in §241.3(d)(1) of this chapter. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c) of this chapter, you must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per §241.4, you must keep records documenting that the material is a listed non-waste under §241.4(a).

(iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.

(iv) For each boiler subject to an emission limit in Table 1 to this subpart, you must also keep records of monthly fuel use by each boiler, including the type(s) of fuel and amount(s) used.

(v) For each boiler that meets the definition of seasonal boiler, you must keep records of days of operation per year.

(vi) For each boiler that meets the definition of limited-use boiler, you must keep a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent and records of fuel use for the days the boiler is operating.

(3) For sources that demonstrate compliance through fuel analysis, a copy of all calculations and supporting documentation that were done to demonstrate compliance with the mercury emission limits. Supporting documentation should include results of any fuel analyses. You can use the results from one fuel analysis for multiple boilers provided they are all burning the same fuel type.

(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.

(6) You must keep the records of all inspection and monitoring data required by §§63.11221 and 63.11222, and the information identified in paragraphs (c)(6)(i) through (vi) of this section for each required inspection or monitoring.

(i) The date, place, and time of the monitoring event.

(ii) Person conducting the monitoring.

(iii) Technique or method used.

(iv) Operating conditions during the activity.

(v) Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that monitoring indicated proper operation.

(vi) Maintenance or corrective action taken (if applicable).

(7) If you use a bag leak detection system, you must keep the records specified in paragraphs (c)(7)(i) through (iii) of this section.

(i) Records of the bag leak detection system output.

(ii) Records of bag leak detection system adjustments, including the date and time of the adjustment, the initial bag leak detection system settings, and the final bag leak detection system settings.

(iii) The date and time of all bag leak detection system alarms, and for each valid alarm, the time you initiated corrective action, the corrective action taken, and the date on which corrective action was completed.

(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.

(e)(1) Within 60 days after the date of completing each performance test (defined in §63.2) as required by this subpart you must submit the results of the performance tests, including any associated fuel analyses, required by this subpart to EPA's WebFIRE database by using CEDRI that is accessed through EPA's CDX (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of EPA's Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/index.html). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk or other commonly used electronic storage media (including, but not limited to, flash drives) to EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, you must also submit these reports, including CBI, to the delegated authority in the format specified by the delegated authority. For any performance test conducted using test methods that are not listed on the ERT Web site, the owner or operator shall submit the results of the performance test in paper submissions to the Administrator at the appropriate address listed in §63.13.

(2) Within 60 days after the date of completing each CEMS performance evaluation test as defined in §63.2, you must submit relative accuracy test audit (RATA) data to EPA's CDX by using CEDRI in accordance with paragraph (e)(1) of this section. Only RATA pollutants that can be documented with the ERT (as listed on the ERT Web site) are subject to this requirement. For any performance evaluations with no corresponding RATA pollutants listed on the ERT Web site, the owner or operator shall submit the results of the performance evaluation in paper submissions to the Administrator at the appropriate address listed in §63.13.

(f) If you intend to commence or recommence combustion of solid waste, you must provide 30 days prior notice of the date upon which you will commence or recommence combustion of solid waste. 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 will commence burning solid waste, and the date of the notice.

(2) The currently applicable subcategory under this subpart.

(3) The date on which you became subject to the currently applicable emission limits.

(4) The date upon which you will commence combusting solid waste.

(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 JJJJJJ, in the boiler becoming subject to subpart JJJJJJ, or in the boiler switching out of subpart JJJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to subpart JJJJJJ, 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.

These federal regulations are cited with the Permit Conditions 4.17, 4.18, 4.19, 4.20, 4.24, 4.25, and 4.26.

7.7 CAM Applicability (40 CFR 64)

Individual permit units at facilities that are subject to Tile V permitting requirements (Tier I permits) may be subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). 40 CFR Part 64 requires CAM for units that meet the following three criteria:

1) The unit must have an emission limit for the pollutant;
2) The unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
3) The unit must have a pre-control potential to emit of greater than the major source thresholds.

At this facility the Cogeneration Boiler, has an emissions limit as well as add-on controls for PM_{10} emissions. As part of this project the facility submitted CAM operational procedures and limits. These are stated in Table 8.1 of the permit. Permit Conditions 8.1 through 8.11 states the recordkeeping that Tamarack will be doing to demonstrate continuous compliance with the 40 CFR 64.

Currently only PM and PM_{10} were evaluated with the issuance of the underlying PTC. $PM_{2.5}$ was not evaluated or included as a permit limit. This permitting action lowers the CAM parameters to (4.5-9.0) inches of H_2O. A document from EPA explains that the removal of $PM_{2.5}$ decreases below 5.0 inches of H_2O. The document can be found at the following link: https://www.epa.gov/air-emissions-monitoring-knowledge-base/monitoring-control-technique-wet-scrubber-particulate-matter. In the event the permit is opened or modified, $PM_{2.5}$ pollutant levels should be analyzed at this indicator range in the wet scrubber.

Under 40 CFR 64 Subpart 64.8, Quality Improvement Plan (QIP), the facility may be subject to a QIP if an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant – specific emissions unit's operating time for a reporting period occurs. This facility has reached that limit and qualifies for a QIP. The facility is currently monitoring the pressure differential and liquid flow rate. The only other method available to employ to assist in monitoring would be monitoring the scrubber liquid outlet concentrations. At this time due to the Tier I minor modification to change the indicator range, and the June 2018 source test results, a QIP to add monitoring of the scrubber liquid outlet concentrations may have a minimal benefit. If the facility meets the 5 percent accumulation of exceedances or excursions after the issuance of this permit, a QIP is recommended.

[11/20/2018]

7.8 Acid Rain Permit (40 CFR 72-75)

Tamarack is not subject to 40 CFR 72-75.

8. PUBLIC COMMENT

This permitting action is not subject to public comment period in accordance with IDAPA 58.01.01.383.03.

9. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.383.03.a, EPA and State of Oregon, the affected state, were notified on October 22, 2018. No comments were received from EPA and the State of Oregon.

Appendix A – Emissions Inventory

This permitting action does not change or affect the emissions inventory; the permits which address the emission inventory are listed below:

P-2009.0064
Tier II/PTC T2-050047
T1-2007.0161

Appendix B – Facility Comments for Draft Permit

The following comments were received from the facility on November 15, 2018:

Facility Comment: Permit condition 4.20, PM/PM_{10} Performance Test

"This message provides documentation on extensive work on the scrubber, boiler, and fans that combined had the effect of allowing the boiler to burn an average of 400 to 500 degrees hotter with greatly enhanced fan system capability and control to ensure efficiency. The documented investment of hundreds of thousands of dollars resulted in a system that is much more effective and efficient in maintaining controlled combustion, with effective emission controls at a different range of scrubber pressure drops than before the work was performed. Our 2018 source test, which showed emissions below 50% of the permit limit at 4.7" pressure drop and at 52% of the permit limit at 3.8" prove this."

"The attached document, Appendix B addendum, "Tamarack Boiler and Emission Control Systems Upgrades 2016 2018" provides an overview of the work performed and its effect. Separate documents provide documentation on each of the individual upgrades via invoices."

"We ask that you review this documentation, and then promptly discuss with us a potential alternative to the unrequested new source test requirement included in Section 4.20 of the draft air permit."

DEQ Response: Permit condition 4.20 has been revised to reflect the manufacturer specifications pressure drop of 4.5 to 9.0 inches of H_2O.

- IDEQ concurred with the revised requested pressure drop range in the addendum submitted by the facility on 12/6/2018, with only one test run, showing compliance.
- The wet scrubber was returned to original construction performance and not upgraded.
- The manufacturer specification sheet attached to the facilities operating and maintenance manual confirms emission compliance within a pressure drop range of 4.5 to 9.0 inches of H_2O.

IDEQ reviewed each document and invoice in detail, including calling and speaking with each vendor that sold parts to or performed work for Tamarack Mill on the wet scrubber mentioned above. With the exception of one vendor, Priest Electric, each vendor verified the parts and work performed were general repairs, replacement, or rebuild of an existing unit. The 1600 amp switchgear was replaced with the exact same unit, no upgrades were made. Therefore, the documents submitted confirmed standard repairs applicable to units which degrade over time were made. In addition, IDEQ confirmed no upgrades were made to refine the existing unit to increase the efficiency. Priest Electric confirmed a new 400 horsepower unit was purchased, however they were not able to confirm this was an upgrade to the system, just that a replacement was purchased. Furthermore, if the wet scrubber was rebuilt to have a higher efficiency or if the unit was changed from its original construction outside of standard repairs and maintenance, a PTC modification with a complete engineering analysis would need to be made to analyze the emissions from the new unit. Therefore, permit condition 4.20 shall be changed to reflect the manufacture recommended pressure drop range. Please see the attached document, appendix B addendum, submitted by the facility for the standard maintenance performed on the wet scrubber.

Appendix B Addendum – Facility Documents for Wet Scrubber Repairs