

# Air Quality

## TIER I OPERATING PERMIT

---

**Permittee** Tamarack Mill, LLC dba Evergreen Forest and Tamarack Energy Partnership

**Permit Number** T1-2019.0024

**Project ID** 62238

**Facility ID** 003-00001

**Facility Location** 3555 US Highway 95 South  
New Meadows, Idaho 83654

### Permit Authority

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

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

**Date Issued** October 17, 2022

**Date Expires** October 17, 2027

*Christina Boulay*

---

**Christina Boulay, Permit Writer**

*Mike Simon*

---

**Mike Simon, Stationary Source Manager**

Pages 2 - 23 redacted -- outside the scope of the SIP

## Emission Limits

### 5.2 Boiler Emissions Limits

Emissions from the boiler stack shall not exceed any emissions rate limit in the following table.

Table 5.3 Boiler Emissions Limits <sup>(a)</sup>

Source Description	PM <sub>2.5</sub> /PM <sub>10</sub>	CO	NO <sub>x</sub>
	lb/hr <sup>(b)</sup>	lb/hr <sup>(b)</sup>	lb/hr <sup>(b)</sup>
Riley Cogeneration Boiler stack	18.00	55.25	22.44

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.
- b) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or EPA-approved alternative test method.

[PTC No. P-2009.0064, 10/13/2022]

### 5.3 Fuel-Burning Equipment PM Standard

In accordance with IDAPA 58.01.01.676, the permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.080 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 8% oxygen by volume of wood products.

[PTC No. P-2009.0064, 8/19/2022; IDAPA 58.01.01.676]

### 5.4 Opacity Limit

~~Emissions from the boiler stack, or any other stack, vent, or functionally equivalent opening associated with the boiler, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.~~

~~[10/13/2022]~~

## Operating Requirements

### 5.5 Boiler Fuel

The boiler shall be fired with wood waste exclusively. Wood waste shall include only clean lumber materials and shall not include materials which have been painted, pigment-stained, or pressure-treated by compounds such as chromated copper arsenate, pentachlorophenol, and creosote, and shall not include manufactured wood products which contain adhesives or resins (e.g., plywood, particle board, flake board, and oriented strand board).

[PTC No. P-2009.0064, 10/13/2022]

### 5.6 Boiler Steam

~~The boiler shall not produce more than 630,732 thousand pounds of steam per any consecutive 12-calendar month period (Mlb/yr).~~

~~[PTC No. P-2009.0064, 10/13/2022]~~

### 5.7 Boiler O<sub>2</sub>

~~The permittee shall calibrate, maintain, and continuously operate an oxygen (O<sub>2</sub>) analyzer in accordance with manufacturer's specifications to ensure compliance with Boiler Emissions Limits. The permittee shall establish the minimum hourly O<sub>2</sub> level during the required CO performance test by computing the average of all the 15-minute readings taken during each test run in the three-run performance stack test and determining the lowest average hourly O<sub>2</sub>~~

concentration. The O<sub>2</sub> analyzer shall be maintained in good working order and operated as efficiently as practicable in accordance with Boiler and Scrubber O&M Manual requirements.

[PTC No. P-2009.0064, 10/13/2022]

### 5.8 Boiler Control Device Requirements

The permittee shall calibrate, maintain, and continuously operate equipment to measure the pressure drop across the wet scrubber and equipment to measure the scrubbing media flow rate to the wet scrubber in accordance with manufacturer's specifications to ensure compliance with Boiler Emissions Limits.

- The wet scrubber shall operate when the boiler operates.
- The wet scrubber shall be maintained in good working order and operated as efficiently as practicable in accordance with Boiler and Scrubber O&M Manual requirements.
- The pressure drop shall be maintained at a minimum of 5.5 inches;
- The media flow rate shall be between 22 and 36 gallons per minute.

[PTC No. P-2009.0064, 10/13/2022]

### 5.9 ~~NESSAP 40 CFR 63, Subpart JJJJJJ—Work Practice Standards, Emission Reduction Measures, and Management Practices~~

~~The permittee shall comply with each work practice, standard, emission reduction measure, and management practice specified in Table 2 to 40 CFR 63, Subpart JJJJJJ.~~

~~Summary of Table 2 to 40 CFR 63, Subpart JJJJJJ~~

<del>Boiler subcategory</del>	<del>You must meet the following...</del>
<del>Existing or new coal-fired, new biomass-fired, or new oil-fired boilers (units with heat input capacity of 10 MMBtu/hr or greater)</del>	<del>Minimize the boiler's startup and shutdown periods and conduct startups and shutdowns according to 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.</del>
<del>Existing biomass-fired boilers that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio</del>	<del>Conduct an initial tune-up as specified in 40 CFR 63.11214, and conduct a tune-up of the boiler biennially as specified in 40 CFR 63.11223.</del>
<del>Existing coal-fired, biomass-fired, or oil-fired boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up</del>	<del>Conduct an initial tune-up as specified in 40 CFR 63.11214, and conduct a tune-up of the boiler every 5 years as specified in 40 CFR 63.11223.</del>

~~[40 CFR 63.11201(b)]~~

### 5.10 NSPS 40 CFR 63, Subpart JJJJJJ—Operating Limits

The permittee shall comply with each applicable operating limit specified in Table 3 to 40 CFR 63, Subpart JJJJJJ.

Summary of Table 3 to 40 CFR 63, Subpart JJJJJJ

<del>If you demonstrate compliance with applicable emission limits using...</del>	<del>You must meet these operating limits except during periods of startup and shutdown...</del>
<del>Wet scrubber control</del>	<del>Maintain the 30-day rolling average pressure drop across the wet scrubber at or above the minimum scrubber pressure drop as defined in §63.11237 and the 30-day rolling average liquid flow rate at or above the minimum scrubber liquid flow rate as defined in 40 CFR 63.11237.</del>
<del>Performance stack testing</del>	<del>For boilers that demonstrate compliance with a performance stack test, maintain the operating load of each unit such that it does not exceed 110 percent of the average operating load recorded during the most recent performance stack test.</del>

~~[40 CFR 63.11201(e)]~~

### **5.11 ~~NESHAP 40 CFR 63, Subpart JJJJJ~~—General Requirements**

~~In accordance with 40 CFR 63.11205(a), the permittee must operate and maintain the unit in a manner consistent with safety and good air pollution control practices for minimizing emissions.~~

~~{40 CFR 63.11205(a)}~~

### **5.12 ~~NESHAP 40 CFR 63, Subpart JJJJJ~~—Continuous Compliance**

~~In accordance with 40 CFR 63 Subpart JJJJJ, Table 2, for affected sources subject to the work practice standard or the management practices of a tune-up, the permittee shall conduct a biennial performance tune-up according to 40 CFR 63.11223(b) and keep records as required in 40 CFR 63.11225(e) to demonstrate continuous compliance. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.~~

~~{40 CFR 63 Subpart JJJJJ Table 2, 40 CFR 63.11223(a),(b)}~~

### **5.13 ~~NESHAP 40 CFR 63, Subpart JJJJJ~~—Continuous Compliance Demonstration**

~~In accordance with 40 CFR 63.11223(b), the permittee must conduct a tune-up of the boiler or process heater biennially to demonstrate continuous compliance as follows:~~

- ~~As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, but the permittee shall inspect each burner at least every 36 months);~~
- ~~Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;~~
- ~~Inspect the system controlling the air to fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly;~~
- ~~Optimize total emissions of carbon monoxide. This optimization should be consistent with manufacturer's specifications, if available;~~
- ~~Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made);~~
- ~~Maintain on-site and submit, if requested by the Administrator, a biennial report containing the following information:~~
  - ~~The concentrations of carbon monoxide in the effluent stream in part per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler;~~
  - ~~A description of any corrective actions taken as a part of the combustion adjustment; and~~
  - ~~The type and amount of fuel used over the 12 months prior to the biennial tune-up.~~
- ~~If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.~~

~~{40 CFR 63.11223(b)}~~

## **Monitoring and Recordkeeping**

### **5.14 ~~Boiler Steam Monitoring~~**

~~Each month, the permittee shall monitor and record the boiler's steam production monthly and annually to demonstrate compliance with the Boiler Emissions Limits and Boiler Steam permit~~

conditions. Annual boiler steam production shall be determined by summing monthly steam production rates over the previous consecutive 12-calendar month period.

The permittee shall install, operate, calibrate, and maintain a monitor to continuously measure the steam production rate of the Riley Cogeneration. Steam production rate records shall be maintained in accordance with Permit Condition 5.5 and 5.8. If the continuous steam production rate monitoring system becomes inoperable, a backup monitoring method consisting of manual monitoring and recordkeeping shall be implemented within 96 hours of the monitoring system becoming inoperable and shall be used until the continuous steam production monitoring system is operational.

[PTC No. P-2009.0064, 10/13/2022]

### **5.15 Boiler O<sub>2</sub> Monitoring**

The permittee shall monitor the O<sub>2</sub> level of the boiler flue gas using the oxygen analyzer. Data shall be monitored and recorded at least once per hour that the boiler is operated. The hourly O<sub>2</sub> content shall be maintained at or above the minimum O<sub>2</sub> level established during the most recent CO performance test.

[PTC No. P-2009.0064, 10/13/2022]

### **5.16 Boiler Chlorine Fuel Sampling**

Each calendar quarter, the permittee shall determine the percent by weight of chlorine in biomass combusted. Quarterly sampling shall also be completed to calculate a sampling derived higher heating value (HHV) (dry basis), which will be used, in the equation to calculate the HCl emission factor. A Boiler Chlorine Fuel Sampling protocol shall be submitted to DEQ meeting the requirements of the Boiler Test Protocols condition and describing the sampling methodology to be used. For each chlorine fuel sample, all species of wood contained in the sample shall be monitored and recorded along with the chlorine results.

[PTC No. P-2009.0064, 10/13/2022]

### **5.17 Boiler and Scrubber O&M Manual**

The facility shall maintain an existing O&M manual for the boiler. Any changes to the O&M manual shall be submitted to DEQ for review and approval 30 days prior to the change. The procedures specified in the Boiler Monitoring Manual are incorporated by reference into this permit and are enforceable permit conditions.

The O&M manual shall describe the methods and procedures that will be followed to ensure compliance with Boiler O<sub>2</sub> Monitoring, Boiler Emissions Limits, proper equipment maintenance and operation provisions, and equipment manufacturer's specifications and recommendations. The O&M manual shall at a minimum contain the following:

- Procedures for installation, calibration, and maintenance of the O<sub>2</sub> analyzer in accordance with manufacturer's instructions.
- Procedures for probe inspection and cleaning, and calibration checks for the O<sub>2</sub> analyzer. Cleaning and calibration checks shall be completed at least once every six months.
- The recommended pressure drop operating range and scrubbing media flow rate.
- Startup, shutdown, upset condition, corrective action, and maintenance procedures.
- The permittee shall operate the boiler in accordance with the O&M manual. The procedures specified in the O&M manual are incorporated by reference into this permit and are enforceable permit conditions. The O&M manual and copies of any manufacturer's manuals and recommendations shall remain on site at all times and shall be made available to DEQ representatives upon request.

Pages 28 - 45 redacted -- outside the scope of the SIP

- Nothing in this permit shall alter or affect the following:
  - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
  - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

~~{Idaho Code §39-108 and 112; IDAPA 58.01.01.122; IDAPA 58.01.01.322.15.m;  
IDAPA 58.01.01.325; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03;  
40 CFR 70.6(f)}~~

## **Compliance Schedule and Progress Reports**

**10.21** The permittee shall comply with the following:

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

~~{IDAPA 58.01.01.322.10; IDAPA 58.01.01.314.9; IDAPA 58.01.01.314.10;  
40 CFR 70.6(e)(3) and (4)}~~

## **Periodic Compliance Certification**

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

- The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
- The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit, including emissions limitations, standards, and work practices;
- The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
  - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
  - The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;

- The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- Such information as DEQ may require to determine the compliance status of the emissions unit.

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

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

### **False Statements**

**10.24** No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125]

### **No Tampering**

**10.25** No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126]

### **Semiannual Monitoring Reports**

**10.26** In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.g; IDAPA 58.01.01.322.08.c; 40 CFR 70.6(a)(3)(iii)]

### **Reporting Deviations and Excess Emissions**

**10.27** The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.e, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.g; IDAPA 58.01.01.135; 40 CFR 70.6(a)(3)(iii)]

### **Permit Revision Not Required**

**10.28** No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b; 40 CFR 70.6(a)(8)]

## **Emergency**

**10.29** ~~In accordance with IDAPA 58.01.01.332, an “emergency”, as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.~~

~~{IDAPA 58.01.01.332.01; 40 CFR 70.6(g)}~~