APPENDIX C

Facility-Wide Emission Inventory

TABLE C-1. POINT EMISSION SOURCES

Source	Associated Building	Source Identification Number
Dry Kiln Vents (20 per each of 4 kilns)	Kilns	LWP-KV-1
Baghouse	Surfacing	LWP-BH-1
Baghouse	Surfacing	LWP-BH-2
Baghouse	Surfacing	LWP-BH-3
Baghouse	LCP	LWP-BH-4
Baghouse	LCP	LWP-BH-5
Baghouse	LCP	LWP-BH-6
Baghouse	LCP	LWP-BH-7
Cyclone	LCP	LWP-CY-1
Cyclone	LCP	LWP-CY-2
Cyclone	LCP	LWP-CY-3
Cyclone	LCP	LWP-CY-4
Cyclone	LCP	LWP-CY-6
Cyclone	Surfacing	LWP-CY-18
Cyclone	Surfacing	LWP-CY-25
Cyclone	Sawmill	LWP-CY-26
Cyclones (common stack)	Sawmill	LWP-CY-27 A & B
Cyclone	Fuel Hog	LWP-CY-FH
Emergency Firewater Pump Engine	-	LWP-IC-1
Emergency Firewater Pump Engine	-	LWP-IC-2
Emergency Firewater Pump Engine	-	LWP-IC-3
Emergency Firewater Pump Engine	-	LWP-IC-4
Greenhouse Emergency Generator Engine	Greenhouse	LWP-IC-5
Emergency Generator	Offices	LWP-ME-50

TABLE C-2. POTENTIAL EMISSION RATES FOR CRITERIA POLLUTANTS

Source/Pollutant	1999 Throughput	Potential Throughput	Units	Emission Factor	Units	Yearly Emiss. (Ton/yr)	See Note
BAGHOUSES AND CYCLONES							
CY-1, Specialties Gang Rip Cyc./PM10	153	354	Tons/yr	0.778	lb/ton	0.14	1
CY-2, Specialties Gang Rip Cyc./PM10	153	354	Tons/yr	0.164	lb/ton	0.03	1
CY-3, Specialties GRECON/PM10	334	773	Tons/yr	0.164	lb/ton	0.06	1
CY-4, Specialties NULOC/PM10	572	1,324	Tons/yr	0.522	lb/ton	0.35	1
CY-6, Specialties, CY-1 to CY-4/PM10	1,115	2,582	Tons/yr	0.164	lb/ton	0.21	1
CY-18, Surfacing, #4 Splitter/PM10	23	53	Tons/yr	0.600	lb/ton	0.02	1
CY-25, Surfac., Chipper, Chips/PM10	8,995	20,826	Tons/yr	0.062	lb/ton	0.64	1
CY-26, Sawmill, All Machine Ctrs/PM10	128	296	Tons/yr	0.165	lb/ton	0.02	1 and 2
CY-27A, Sawmill, All Machine Ctrs/PM10	81	188	Tons/yr	0.780	lb/ton	0.07	1 and 2
CY-27B, Sawmill, All Machine Ctrs/PM10	81	188	Tons/yr	0.780	lb/ton	0.07	1
CY-FH, Fuel Hog/PM10		5,096	Tons/yr	0.686	lb/ton	1.75	12
BH-1, Surfacing/PM10		8760	hr/yr	0.926	lb/hr	4.05	3
BH-2, Surfacing/PM10		8760	hr/yr	0.977	lb/hr	4.28	3
BH-3, Surfacing/PM10		8760	hr/yr	1.054	lb/hr	4.62	3
BH-4, Profile/PM10		8760	hr/yr	1.157	lb/hr	5.07	3
BH-5, Profile/PM10		8760	hr/yr	1.106	lb/hr	4.84	3
BH-6, Profile/PM10		8760	hr/yr	0.900	lb/hr	3.94	3
BH-7, Profile/PM10		8760	hr/yr	0.849	lb/hr	3.72	3
GL-1, VOC's from Lewiston Cedar Products Edge&FJ glue							
VOCs		231,382	lb/yr	0.029	lb/lb glue	3.36	4
KILN VENTS, KV-1							
PM10 (hemlock)		260,382	MBF/yr	0.051	lb/MBF	6.64	5
VOCs (fir/larch)		351,009	MBF/yr	0.61	lb/MBF	107.06	5
Engine IC-5, 125 hp Greenhouse Generator							
PM10		500	hr/yr	0.28	lb/hr	0.07	6
SOx		500	hr/yr	0.26	lb/hr	0.06	7
CO		500	hr/yr	0.84	lb/hr	0.21	7
NOx		500	hr/yr	3.88	lb/hr	0.97	7
VOCs		500	hr/yr	0.31	lb/hr	0.08	8
Engines IC-1 to IC-4, 170 hp Fire Pump Engines (Total for all four)							
PM10		500	hr/yr	0.37	lb/hr	0.37	6
SOx		500	hr/yr	0.35	lb/hr	0.35	7
CO		500	hr/yr	1.14	lb/hr	1.14	7
NOx		500	hr/yr	5.27	lb/hr	5.27	7
VOCs		500	hr/yr	0.42	lb/hr	0.42	8
Propane Emergency Generator ME-49, <5 MMBtu/hr							
PM10		500	hr/yr	0.05	lb/hr	0.01	15
SOx		500	hr/yr	2.94E-03	lb/hr	0.001	15
CO		500	hr/yr	2.785	lb/hr	0.70	15

Source/Pollutant	1999 Throughput	Potential Throughput	Units	Emission Factor	Units	Yearly Emiss. (Ton/yr)	See Note
NOx		500	hr/yr	20.4	lb/hr	5.10	15
VOCs		500	hr/yr	0.59	lb/hr	0.15	15
Diesel Emergency Generator ME-50, 90kW							
PM10		500	hr/yr	0.05	lb/hr	0.13	15
SOx		500	hr/yr	2.94E-03	lb/hr	0.124	15
CO		500	hr/yr	2.785	lb/hr	0.40	15
NOx		500	hr/yr	20.4	lb/hr	1.87	15
VOCs		500	hr/yr	0.59	lb/hr	0.15	15
Propane Heaters, ME-51 and ME-52, (Total for all 18)							
PM10		8,760	hr/yr	0.024	lb/hr	0.11	14
SOx		8,760	hr/yr	0.001	lb/hr	0.01	14
CO		8,760	hr/yr	0.115	lb/hr	0.50	14
NOx		8,760	hr/yr	0.849	lb/hr	3.72	14
VOCs		8,760	hr/yr	0.015	lb/hr	0.07	14
Natural Gas Generator ME-57, 200 kW							
PM10		500	hr/yr	0.01	lb/hr	1.70E-03	15
SOx		500	hr/yr	4.01E-04	lb/hr	1.00E-04	15
CO		500	hr/yr	0.38	lb/hr	0.10	15
NOx		500	hr/yr	2.78	lb/hr	0.70	15
VOCs		500	hr/yr	0.08	lb/hr	0.02	15
Vehicles, unpaved roads (pre-controlled)							
Log Trucks, Dirt Roads/PM10		12650.4	VMT/yr	7.27	lb/VMT	20.42	
Log Trucks, Gravel Road/PM10		5421.6	VMT/yr	4.76	lb/VMT	5.73	
Lumber Trucks (flatbed)/PM10		0	VMT/yr	0.00	lb/VMT	0.00	
966 Cat/PM10		1140	VMT/yr	1.40	lb/VMT	0.35	
930 Cat/PM10		720	VMT/yr	1.16	lb/VMT	0.19	
T-Bird Sorter/PM10		260	VMT/yr	1.94	lb/VMT	0.11	
229 Cat Sorter/PM10		260	VMT/yr	1.72	lb/VMT	0.10	
LeTourneau Loader/PM10		12960	VMT/yr	2.34	lb/VMT	6.74	
988 B Cat/PM10		12960	VMT/yr	2.18	lb/VMT	6.26	
980 C Cat/PM10		6080	VMT/yr	1.94	lb/VMT	2.62	
Barko Loader/PM10		260	VMT/yr	1.73	lb/VMT	0.10	
K.W. Water Tanker/PM10		8400	VMT/yr	1.85	lb/VMT	3.44	
International Dump Truck/PM10		15600	VMT/yr	1.23	lb/VMT	4.26	
		AP-42 reduction to account for dust supression				75%	
					Post-control subtotal	12.58	
Vehicles, paved roads							
Flatbed trucks/PM10		2,284.1	VMT/yr	2.17	lb/VMT	2.48	
Conveyors and Piles							
PM10						2.16E-03	
					Total PM-10	56	T/yr
					Total SOx	0.4	T/yr
					Total CO	3	T/yr
					Total NOx	19	T/yr
					Total VOCs	108	T/yr

TABLE C-3. POTENTIAL EMISSION RATE FOR TAPS AND HAPS

Source/Pollutant	TAP/HAP?	Potential Throughput	Units	Emission Factor	Units	Yearly Emiss. (ton/yr)	See Note
GL-1, VOC's from Lewiston Cedar Products Edge&FJ glue							
Formaldehyde	TAP & HAP	231,382	lb/yr	0.0014	lb/lb adhesive	0.16	4
KILN VENTS, KV-1							
Acetaldehyde	TAP & HAP	351,009	MBF/yr	0.0078	lb/MBF	1.37	11
Formaldehyde	TAP & HAP	351,009	MBF/yr	0.001	lb/MBF	0.18	9
Methanol	TAP & HAP	351,009	MBF/yr	0.12	lb/MBF	21.06	9
Methyl ethyl ketone	TAP & HAP	351,009	MBF/yr	0.0013	lb/MBF	0.23	11
Phenol	TAP & HAP	351,009	MBF/yr	0.004	lb/MBF	0.70	10
Engine IC-5, 125 hp Greenhouse Generator							
1,3-Butadiene	TAP & HAP	500	hr/yr	1.24E-05	lb/hr	3.11E-06	13
Acenaphthene	HAP	500	hr/yr	4.52E-07	lb/hr	1.13E-07	13
Acenaphthylene	HAP	500	hr/yr	1.61E-06	lb/hr	4.02E-07	13
Acetaldehyde	TAP & HAP	500	hr/yr	2.44E-04	lb/hr	6.10E-05	13
Acrolein	TAP & HAP	500	hr/yr	2.94E-05	lb/hr	7.36E-06	13
Anthracene	HAP	500	hr/yr	5.95E-07	lb/hr	1.49E-07	13
Benzene	TAP & HAP	500	hr/yr	2.97E-04	lb/hr	7.42E-05	13
Benzo(a)anthracene	HAP	500	hr/yr	5.34E-07	lb/hr	1.34E-07	13
Benzo(a)pyrene	TAP & HAP	500	hr/yr	5.98E-08	lb/hr	1.49E-08	13
Benzo(b)fluoranthene	HAP	500	hr/yr	3.15E-08	lb/hr	7.88E-09	13
Benzo(k)fluoranthene	HAP	500	hr/yr	4.93E-08	lb/hr	1.23E-08	13
Benzo(g,h,i)perylene	HAP	500	hr/yr	1.56E-07	lb/hr	3.89E-08	13
Chrysene	HAP	500	hr/yr	1.12E-07	lb/hr	2.81E-08	13
Dibenzo(a,h)anthracene	HAP	500	hr/yr	1.85E-07	lb/hr	4.64E-08	13
Fluoranthene	HAP	500	hr/yr	2.42E-06	lb/hr	6.05E-07	13
Fluorene	HAP	500	hr/yr	9.29E-06	lb/hr	2.32E-06	13
Formaldehyde	TAP & HAP	500	hr/yr	3.75E-04	lb/hr	9.38E-05	13
Indeno(1,2,3,c,d)pyrene	HAP	500	hr/yr	1.19E-07	lb/hr	2.98E-08	13
Naphthalene	TAP & HAP	500	hr/yr	2.70E-05	lb/hr	6.74E-06	13
Phenanthrene	HAP	500	hr/yr	9.35E-06	lb/hr	2.34E-06	13
Pyrene	HAP	500	hr/yr	1.52E-06	lb/hr	3.80E-07	13
Toluene	TAP & HAP	500	hr/yr	1.30E-04	lb/hr	3.25E-05	13
Xylenes	TAP & HAP	500	hr/yr	9.06E-05	lb/hr	2.27E-05	13
Engines IC-1 to IC-4, 170 hp Fire Pump Engines (Total for all four)							
1,3-Butadiene	TAP & HAP	500	hr/yr	1.69E-05	lb/hr	1.69E-05	13
Acenaphthene	HAP	500	hr/yr	6.14E-07	lb/hr	6.14E-07	13
Acenaphthylene	HAP	500	hr/yr	2.19E-06	lb/hr	2.19E-06	13
Acetaldehyde	TAP & HAP	500	hr/yr	3.32E-04	lb/hr	3.32E-04	13
Acrolein	TAP & HAP	500	hr/yr	4.00E-05	lb/hr	4.00E-05	13
Anthracene	HAP	500	hr/yr	8.09E-07	lb/hr	8.09E-07	13
Benzene	TAP & HAP	500	hr/yr	4.04E-04	lb/hr	4.04E-04	13
Benzo(a)anthracene	HAP	500	hr/yr	7.27E-07	lb/hr	7.27E-07	13
Benzo(a)pyrene	TAP & HAP	500	hr/yr	8.13E-08	lb/hr	8.13E-08	13
Benzo(b)fluoranthene	HAP	500	hr/yr	4.29E-08	lb/hr	4.29E-08	13
Benzo(k)fluoranthene	HAP	500	hr/yr	6.70E-08	lb/hr	6.70E-08	13
Benzo(g,h,i)perylene	HAP	500	hr/yr	2.12E-07	lb/hr	2.12E-07	13

Source/Pollutant	TAP/HAP?	Potential Throughput	Units	Emission Factor	Units	Yearly Emiss. (ton/yr)	See Note
Chrysene	HAP	500	hr/yr	1.53E-07	lb/hr	1.53E-07	13
Dibenzo(a,h)anthracene	HAP	500	hr/yr	2.52E-07	lb/hr	2.52E-07	13
Fluoranthene	HAP	500	hr/yr	3.29E-06	lb/hr	3.29E-06	13
Fluorene	HAP	500	hr/yr	1.26E-05	lb/hr	1.26E-05	13
Formaldehyde	TAP & HAP	500	hr/yr	5.10E-04	lb/hr	5.10E-04	13
Indeno(1,2,3,c,d)pyrene	HAP	500	hr/yr	1.62E-07	lb/hr	1.62E-07	13
Naphthalene	TAP & HAP	500	hr/yr	3.67E-05	lb/hr	3.67E-05	13
Phenanthrene	HAP	500	hr/yr	1.27E-05	lb/hr	1.27E-05	13
Pyrene	HAP	500	hr/yr	2.07E-06	lb/hr	2.07E-06	13
Toluene	TAP & HAP	500	hr/yr	1.77E-04	lb/hr	1.77E-04	13
Xylenes	TAP & HAP	500	hr/yr	1.23E-04	lb/hr	1.23E-04	13
Engine ME-50, 90kW Emergency Generator							
1,3-Butadiene	TAP & HAP	500	hr/yr	1.20E-05	lb/hr	1.20E-05	5
Acenaphthene	HAP	500	hr/yr	4.36E-07	lb/hr	4.36E-07	5
Acenaphthylene	HAP	500	hr/yr	1.55E-06	lb/hr	1.55E-06	5
Acetaldehyde	TAP & HAP	500	hr/yr	2.36E-04	lb/hr	2.36E-04	5
Acrolein	TAP & HAP	500	hr/yr	2.84E-05	lb/hr	2.84E-05	5
Anthracene	HAP	500	hr/yr	5.74E-07	lb/hr	5.74E-07	5
Benzene	TAP & HAP	500	hr/yr	2.87E-04	lb/hr	2.87E-04	5
Benzo(a)anthracene	HAP	500	hr/yr	5.16E-07	lb/hr	5.16E-07	5
Benzo(a)pyrene	TAP & HAP	500	hr/yr	5.77E-08	lb/hr	5.77E-08	5
Benzo(b)fluoranthene	HAP	500	hr/yr	3.04E-08	lb/hr	3.04E-08	5
Benzo(k)fluoranthene	HAP	500	hr/yr	4.76E-08	lb/hr	4.76E-08	5
Benzo(g,h,i)perylene	HAP	500	hr/yr	1.50E-07	lb/hr	1.50E-07	5
Chrysene	HAP	500	hr/yr	1.08E-07	lb/hr	1.08E-07	5
Dibenzo(a,h)anthracene	HAP	500	hr/yr	1.79E-07	lb/hr	1.79E-07	5
Fluoranthene	HAP	500	hr/yr	2.34E-06	lb/hr	2.34E-06	5
Fluorene	HAP	500	hr/yr	8.97E-06	lb/hr	8.97E-06	5
Formaldehyde	TAP & HAP	500	hr/yr	3.62E-04	lb/hr	3.62E-04	5
Indeno(1,2,3,c,d)pyrene	HAP	500	hr/yr	1.15E-07	lb/hr	1.15E-07	5
Naphthalene	TAP & HAP	500	hr/yr	2.60E-05	lb/hr	2.60E-05	5
Phenanthrene	HAP	500	hr/yr	9.03E-06	lb/hr	9.03E-06	5
Pyrene	HAP	500	hr/yr	1.47E-06	lb/hr	1.47E-06	5
Toluene	TAP & HAP	500	hr/yr	1.26E-04	lb/hr	1.26E-04	5
Xylenes	TAP & HAP	500	hr/yr	8.75E-05	lb/hr	8.75E-05	5
					Total TAPs	**23.699**	
					Total HAPs	**23.699**	

Notes for Tables C-2 and C-3:

1. Current year throughput is calculated by multiplying 1999 data by the ratio of current production to production for 1999, which was 151,607 MBF.
2. Hourly rates estimated per PTC Applicability Determination P-940222, May, 1995. Calculation: {[(lb/hr)(hr/yr)/2,000 lb/ton](emission factor)} / 2,000 lb/ton.
3. Manufacturer's guarantee (gr/cf × fan output (cfm) × lb/gr).
4. Information from glue manufacturer (MSDS)
5. Assumes 100% Hemlock (PM10) and 100% Douglas Fir (VOCs), using emission factors from Oregon Department of Environmental Quality Emission Factors for Wood Products (AQ-EF02, June 26, 2003). See Section 3.1 for kiln throughputs of each species.
6. AP-42 Table 3.3-1 (10/96): Diesel Fuel (assumed PM = PM-10)
7. AP-42 Table 3.3-1 (10/96): Diesel Fuel
8. AP-42 Table 3.3-1 (10/96): Diesel Fuel (exhaust TOC)
9. Formaldehyde and methanol emission factors from OSU Forest Products Study, September 2000.
10. Phenol emission factor is provided by ORCAA, and is based on Cowlitz Stud Co. Study.
11. Acetaldehyde and MEK emission factors from Table D4, June 9, 2000 letter to Mary Tom Kissell (EPA) from Katie Hanks, MRI.
12. Throughput calculated from highest recorded hog volume from May 2005 to Feb 2007, 4900 lb/hr × 52 wk/yr × 5 dy/wk × 8 hr/dy / 2000 lb/ton.
13. AP-42 Table 3.3-2 (10/96): Diesel Fuel
14. AP-42 Table 1.4-2 (07/98): Natural Gas Combustion
15. AP-42 Table 3.2-1 (08/00): Natural Gas Engines

TABLE C-4. POINT SOURCE PARAMETERS

Source Identification Number	Stack Height (ft)	Stack Diameter (ft)	Exhaust Temperature (F)	Exhaust Exit Velocity (ft/s)	Exhaust Type
LWP-KV-1[a]	27	2.6	180	1.14	Vertical
LWP-BH-1	43	4.3	Ambient	41.3	Vertical
LWP-BH-2	18	4.3	Ambient	43.6	Vertical
LWP-BH-3	43	4.3	Ambient	47.0	Vertical
LWP-BH-4	9	4	Ambient	59.7	Vertical
LWP-BH-5	9	4	Ambient	57.1	Vertical
LWP-BH-6	9	4	Ambient	46.4	Vertical
LWP-BH-7	9	4	Ambient	43.8	Vertical
LWP-CY-1	40	4	Ambient	17.5	Vertical
LWP-CY-2	40	3	Ambient	23.8	Vertical
LWP-CY-3	40	3	Ambient	24.3	Vertical
LWP-CY-4	40	3	Ambient	17.0	Vertical
LWP-CY-6	40	2.5	Ambient	30.6	Vertical
LWP-CY-18	40	3	Ambient	17.0	Vertical
LWP-CY-25	25	3	Ambient	12.9	Vertical
LWP-CY-26	15	2.5	Ambient	173.2	Vertical
LWP-CY-27 A & B	15	3	Ambient	76.6	Vertical
LWP-CY-FH	56	6.6	Ambient	7.34	Horizontal
LWP-IC-1[b]	67	2.8	60	135.3	Vertical
LWP-IC-2[b]	67	2.8	60	135.3	Vertical
LWP-IC-3[b]	67	2.8	60	135.3	Vertical
LWP-IC-4[b]	74	3.17	60	135.3	Vertical
LWP-IC-5[b]	74	3.17	60	99.5	Vertical

(a) Each of the four kilns has twenty 28-inch square vents. The exhaust velocity, equivalent diameter, and termperature are for each vent, and are taken from the Kiln PTC, P-050200.

(b) For emergency use only.

APPENDIX D

Insignificant Activities

Insignificant Activities

Several emission sources and activities at the Facility are considered categorically exempt insignificant emission units and activities under IDAPA 58.01.01.317.01.a and as such need not be addressed in this application in accordance with IDAPA 58.01.01.317.01.a(i), and do not require a permit under Idaho Code § 39-115(1)(b). However, units and activities that qualify as "insignificant on the basis of size or production rate" must be listed in the permit application (IDAPA 58.01.01.317.01.b). The following table identifies those emission units that are exempt on the basis of size or production rate.

Emissions Unit	Activity	Citation
LWP-ME-4	Conveyers in log handling area	IDAPA Section 317.01(b)(i)(30)
LWP-ME-5	Belt conveyors from sawmill to pulp mill	IDAPA Section 317.01(b)(i)(30)
LWP-ME-8	Gasoline dispensing pump	IDAPA Section 317.01(b)(i)(2)
LWP-ME-9	Diesel dispensing pump	IDAPA Section 317.01(b)(i)(2)
LWP-ME-28	500-gallon diesel storage tank	IDAPA Section 317.01(b)(i)(2)
LWP-ME-29	Four 100-gallon oil tanks	IDAPA Section 317.01(b)(i)(2)
LWP-ME-32	500-gallon gasoline tank	IDAPA Section 317.01(b)(i)(2)
LWP-ME-34	Propane filling station, 18,000 gallons	IDAPA Section 317.01(b)(i)(4)
LWP-ME-38	1000-gallon diesel storage tank	IDAPA Section 317.01(b)(i)(2)
LWP-ME-49	Emergency propane generator, < 5 MMBtu/hr	IDAPA Section 317.01(b)(i)(5)
LWP-ME-50	Emergency diesel generator 90 kW (greenhouse)	IDAPA Section 317.01(b)(i)(5)
LWP-ME-51	Seventeen Propane heaters (greenhouse)	IDAPA Section 317.01(b)(i)(5)
LWP-ME-52	Propane ceiling heater (greenhouse)	IDAPA Section 317.01(b)(i)(5)
LWP-ME-53	Sawmill grinding room dust collection (cyclone 33)	IDAPA Section 317.01(b)(i)(30)
LWP-ME-54	Sawmill filing room dust collection (cyclone 34)	IDAPA Section 317.01(b)(i)(30)
LWP-ME-55	Profile grinding room dust collection (cyclone 35)	IDAPA Section 317.01(b)(i)(30)
LWP-ME-57	200-kW natural gas fired emergency generator	IDAPA Section 317.01(b)(i)(5)

APPENDIX E

Requirement-Specific Compliance Certification and Demonstration Methodology

Requirement-Specific Compliance Certification and Demonstration at the Time of Application Submission

1 Tier I Permit Condition	2 Permit Condition Title/Description	3 Compliance Status	4 Compliance Determination Methods
Facility Wide Conditions			
2.1	Control of fugitive dust.	In	See 2..2, 2.3, 2.4, 2.12, 2.13
2.2	Monitor and maintain records of methods used to control fugitive dust.	In	Paper documentation of methods on file.
2.3	Record of fugitive dust complaints.	In	Fugitive dust complaint log.
2.4	Quarterly inspection of fugitive dust.	In	Documentation of inspections.
2.5	Control of odor.	In	See 2.6, 2.12, 2.13
2.6	Record of public odor complaints.	In	Public complaint log.
2.7	Visible emissions limit – 20% opacity.	In	See 2.8, 2.12, 2.13
2.8	Quarterly inspection of visible emissions.	In	Documentation of monthly inspections on file.
2.9	Excess Emissions.	In	See 2.9-2.9.5, 2.12, 2.13
2.10	Compliance Testing.	In	See 2.12, 2.13
2.11	Test Methods.	In	NA
2.12	Reports and certifications.	In	Reports and certifications.
2.13	Monitoring and record keeping.	In	Monitoring and record keeping.
2.14	Open Burning.	In	See 2.12, 2.13
2.15	Asbestos demolition or renovation.	In	See 2.12, 2.13
2.16	Chemical Accident Prevention.	In	See 2.12, 2.13
2.17	Plywood and Composite Wood Products MACT	In	Notification on file
EU-1 – Lumber Dry Kilns			
3.1	Process weight	In	Comparison of throughput rates with PM10 emission factors. Obsolete condition.
3.2	Visible emissions	In	Monthly facility-wide inspections (see below)
3.3	Monthly Method 22 observations	In	Records of inspections on file
New condition (PTC 050200 Condition 2.3)	Emissions from the drying kilns, or any other stack, vent, or functionally equivalent opening associated with the drying kilns, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required	In	Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625, unless otherwise specified.

1 Tier I Permit Condition	2 Permit Condition Title/Description	3 Compliance Status	4 Compliance Determination Methods
	by IDAPA 58.01.01.625.		
New PTC conditions 2.4.1 and 2.8 NOT APPROPRIATE AS TIER I CONDITION	Emissions of acetaldehyde shall not exceed 2,738 pounds per any consecutive 12-month period.	In	Compliance determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis. Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.
New PTC conditions 2.4.2 and 2.8 NOT APPROPRIATE AS TIER I CONDITON	Emissions of formaldehyde shall not exceed 983 pounds per any consecutive 12-month period.	In	Compliance determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis. Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.
New condition (PTC 050200 Condition 2.5)	The throughput of lumber for the drying kilns shall not exceed 351,009 thousand board feet (Mbf) during any consecutive 12-month period.	In	Throughput monitoring per Condition 2.8
New condition (PTC 050200 Condition 2.6)	The following wood species shall not be processed in the lumber drying kilns: white pine, Ponderosa pine, Southern yellow pine, Red pine, Lodgepole pine, and Sugar pine.	In	Each month, the permittee shall monitor and record the throughput and wood species of lumber for the drying kilns in units of thousand board feet (Mbf) for that month and for the most recent consecutive 12-month period. A compilation of the most recent two years of records shall be kept on site and shall be made available to DEQ representatives upon request.
New condition (PTC 050200 Condition 2.7)	The duration of concurrent operation of the 32 existing Moore and LSI kilns and the four new Wellons kilns shall not exceed 180 days. The period of allowable concurrent operation commences on the date of initial startup of one or more of the Wellons kilns and terminates after 180 consecutive days following	In	Obsolete Condition. Old kilns have been removed.

1 Tier I Permit Condition	2 Permit Condition Title/Description	3 Compliance Status	4 Compliance Determination Methods
	initial startup.		
New condition (PTC 050200 Condition 2.8)	Each month, the permittee shall monitor and record the throughput and wood species of lumber for the drying kilns in units of thousand board feet (Mbf) for that month and for the most recent consecutive 12-month period. A compilation of the most recent two years of records shall be kept on site and shall be made available to DEQ representatives upon request	In	Records on file
New condition (PTC 050200 Condition 2.9)	The permittee shall submit initial notification of applicability to 40 CFR 63—Subpart DDDD to DEQ and EPA Region 10 in accordance with the following: 40 CFR 63.9(b) Initial notification	In	Obsolete condition: Notification letter on file
IDAPA 58.01.01.701	Process weight for new units	In	Comparison of throughput rates with PM10 emission factors
EU-2 – Sawmill, Surfacing Department, Lewiston Cedar Products Process Material Handling Equipment			
4.1	Process weight limit for old units	In	Calculation
4.2	Process weight limit for new units	In	Calculation
4.3	Visible emissions	In	Monthly facility-wide inspections (see below)
4.4	Monthly Method 22 observations	In	Records of inspections on file
4.5	Maintain baghouses in good working order. O&M manual required	In	O&M manual available on-site.
EU-3 – Fire Pump Engines and Emergency Electrical Generator Engines			
5.1	Sulfur limits for distillate fuel	In	Condition 5.3
5.2	Visible emissions	In	Monthly facility-wide inspections
5.3	Documentation of fuel sulfur required	In	Fuel vendor receipts on files
General Provisions			
1	General Compliance.	In	NA
2-3	General Compliance.	In	NA
4-5	Reopening.	In	NA
6	Property Rights.	In	NA
7-8	Information Requests.	In	NA

1 Tier 1 Permit Condition	2 Permit Condition Title/Description	3 Compliance Status	4 Compliance Determination Methods
9	Severability	In	NA
10-11	Changes requiring permit revision or notice.	In	NA
12-13	Federal and state enforceability.	In	NA
14	Inspection and entry.	In	NA
15	New requirements during permit term.	In	NA
16	Fees.	In	Cover letter and transfer of funds to DEQ.
17	Certification.	In	See Appendix B of this application.
18	Renewal.	In	NA
19	Permit Shield.	In	NA
20	Compliance Schedule and Progress Reports.	In	NA
21	Periodic Compliance Certification.	In	Copies are on file at the Facility.
22	False Statements.	In	NA
23	No Tampering.	In	NA
24	Semi-annual monitoring reports.	In	Copies are on file at the Facility.
25	Reporting Deviations and Excess Emissions.	In	NA
26	Permit Revision Not Required.	In	NA
27	Emergency.	In	NA

APPENDIX F

Potentially Applicable Regulations

I. Federal Regulatory Requirements

Emissions Unit	Citation under Federal Regulations	Applicable Requirement	Description of Requirements or Standards
Facility Wide	40 CFR Part 52	No	Approval and Promulgation of Implementation Plans; Rules for Prevention of Significant Deterioration. • The Facility is not a major source with respect to the Prevention of Significant Deterioration program. Facility-wide PTE are less than the applicability thresholds.
Tanks	40 CFR Part 60 Subpart Kb	No	Standards of Performance for New Stationary Sources. No tanks of the size regulated by Subpart Kb are at the facility.
Boilers	40 CFR Part 60 Subparts D, Db, Dc	No	The facility obtains its steam from IPPD and does not operate its own boilers.
Emergency Generators	40 CFR Part 60 Subpart IIII	No	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, Proposed Rule (July 15, 2005). Existing generators were built before the applicability date of the rule
Facility Wide	40 CFR Part 61, Subpart M	Yes	National Emission Standards for Hazardous Air Pollutants, Asbestos. • LWP will comply with the Asbestos NESHAP if any asbestos renovation occurs on-site.
Kilns	40 CFR Part 63, Subpart A	Yes	National Emission Standards for Hazardous Air Pollutants for Source Categories
Kilns	40 CFR Part 63, Subpart DDDD	Yes	National Emission Standards for Hazardous Air Pollutants for Plywood and Composite Wood Products
Facility Wide	40 CFR Part 68	No	Chemical Accident Prevention Provisions • The Facility is not currently subject to this regulatory program. Per 68.10(a), the facility must comply with the Provisions' requirements as soon as the quantity of a regulated substance is above its threshold quantity in a process.
Facility Wide	40 CFR Part 70	Yes	Tier I Operating Permit Program. • The Facility is a major source with respect to Title V operating permit program.
Facility Wide	40 CFR Part 72	No	Acid Rain Program • The Facility is not subject to these provisions because it is not a utility electric generating station
Facility Wide	40 CFR Part 82, Subpart F	Yes	Recycling and Emission Reductions related to refrigerants • The Facility is subject to this program

II. Idaho Regulatory Requirements
IDAPA 58.01.01 and 40 CFR § 52.670

Applicable Equipment	Citation under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
Facility Wide	121	Yes	COMPLIANCE REQUIREMENTS BY DEPARTMENT
Facility Wide	122	Yes	INFORMATION ORDERS BY THE DEPARTMENT
Facility Wide	123	Yes	CERTIFICATION OF DOCUMENTS
Facility Wide	124	Yes	TRUTH, ACCURACY AND COMPLETENESS OF DOCUMENTS
Facility Wide	125	Yes	FALSE STATEMENTS
Facility Wide	126	Yes	TAMPERING
Facility Wide	130	Yes	STARTUP, SHUTDOWN, SCHEDULED MAINTENANCE, SAFETY MEASURES, UPSET AND BREAKDOWN.
Facility Wide	131	Yes	EXCESS EMISSIONS. • Applicability.
Facility Wide	132	Yes	CORRECTION OF CONDITION. • Excess emission events must be corrected with all practical speed.
Facility Wide	133	Yes	STARTUP, SHUTDOWN AND SCHEDULED MAINTENANCE REQUIREMENTS. • Prescribes procedures that apply when startup, shutdown, or scheduled maintenance is expected to result in an excess emissions event.
Facility Wide	134	Yes	UPSET, BREAKDOWN AND SAFETY REQUIREMENTS. • Prescribes procedures for when upset or breakdown or the initiation of safety measures is expected to result in an excess emissions event.
Facility Wide	135	Yes	EXCESS EMISSIONS REPORTS. • Written reports for each excess emissions must be submitted to the Department within 15 days after the beginning of the event.
Facility Wide	136	Yes	EXCESS EMISSIONS RECORDS. • Records of excess emissions must be maintained for 5 years.
Facility Wide	155	Yes	CIRCUMVENTION. • Prohibits concealing emissions.
Facility Wide	156	Yes	TOTAL COMPLIANCE • Requires compliance with all rules when more than one applies.
Facility Wide	157	Yes	TEST METHODS AND PROCEDURES. • Establishes procedures and requirements for test methods and results.
Facility Wide	161	Yes	TOXIC SUBSTANCES. (state-only) • Toxic contaminants shall not be emitted as to injure or unreasonably affect human or animal life or vegetation.

Applicable Equipment	Citation under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
Facility Wide	200	Yes	PROCEDURES AND REQUIREMENTS FOR PERMITS TO CONSTRUCT. • The facility must submit a PTC application before adding or modifying an air pollution source unless the modification is exempt or it is allowed by an established FEC.
Facility Wide	201	Yes	PERMIT TO CONSTRUCT REQUIRED.
Facility Wide	202	No	APPLICATION PROCEDURES
Facility Wide	203	No	PERMIT REQUIREMENTS FOR NEW AND MODIFIED STATIONARY SOURCES
Facility Wide	204	No	PERMIT REQUIREMENTS FOR NEW MAJOR FACILITIES OR NEW MAJOR MODIFICATIONS IN NONATTAINMENT AREAS
Facility Wide	205	No	PERMIT REQUREMENTS FOR NEW MOJOR FACILITIES OR NEW MAJOR MODIFICATIONS IN ATTAINMENT OR UNCLASSIFIABLE AREAS
Facility Wide	206	No	OPTIONAL OFFSETS FOR PERMITS TO CONSTRUCT
	207	No	REQUIREMENTS FOR EMISSION REDUCTION CREDIT
Facility Wide	208	No	DEMONSTRATION OF NET AIR QUALITY BENEFIT
	209	No	PROCEDURE FOR ISSUEING PERMITS
Facility Wide	210	Yes	DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE WITH TOXIC STANDARDS.(state-only)
Facility Wide	211	No	CONDITIONS FOR PERMITS TO CONSTRUCT.
Facility Wide	212	Yes	OBLIGATION TO COMPLY.
Facility Wide	213	Yes	PRE-PERMIT CONSTRUCTION.
Facility Wide	214	Yes	DEMONSTRATION OF PRECONSTRUCTION COMPLIANCE FOR NEW AND RECONSTRUCTED MAJOR SOURCES OF HAZARDOUS AIR POLLUTANTS
Facility Wide	300	Yes	PROCEDURES AND REQUIREMENTS FOR TIER I OPERATING PERMITS. • The Facility is a major source with respect to Tier I operating permit program.
Facility Wide	301	Yes	REQUIREMENT TO OBTAIN TIER I OPERATING PERMIT
Facility Wide	311	Yes	STANDARD PERMIT APPLICATIONS
Facility Wide	312	Yes	DUTY TO APPLY
Facility Wide	313	Yes	TIMELY APPLICATION
Facility Wide	314	Yes	REQUIRED STANDARD APPLICATION FORM AND REQUIRED INFORMATION
Facility Wide	315	Yes	DUTY TO SUPPLEMENT OR CORRECT APPLICATION
Facility Wide – Insignificant Sources	317	Yes	INSIGNIFICANT ACTIVITIES
Facility Wide	322	Yes	STANDARD CONTENTS OF TIER 1 OPERATING PERMITS
Facility Wide	332	Yes	EMERGENCY AS AN AFFIRMATIVE DEFENSE REGARDING EXCESS EMISSIONS
Facility Wide	368	Yes	EXPIRATION OF PRECEDING PERMITS
Facility Wide	369	Yes	TIER 1 OPERATING PERMIT RENEWAL
Facility Wide	380	Yes	CHANGES TO TIER I OPERATING PERMITS
Facility Wide	387	Yes	REGISTRATION AND REGISTRATION FEES
Facility Wide	388	Yes	APPLICABILITY
Facility Wide	389	Yes	REGISTRATION
Facility Wide	390	Yes	REQUEST FOR INFORMATION

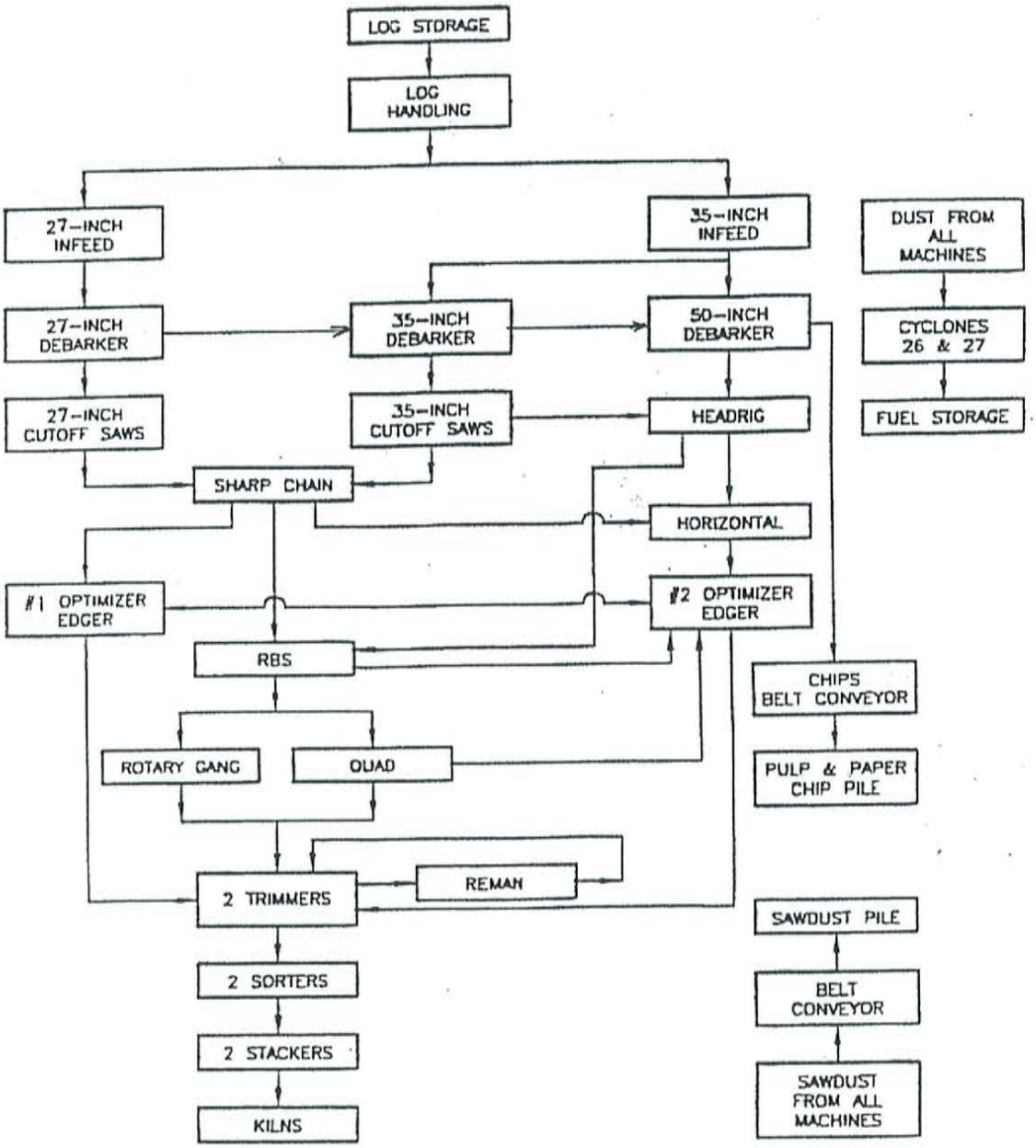
Applicable Equipment	Citation under IDAPA 58.01.01	Applicable Requirement	Description of Requirements or Standards
Facility Wide	391	Yes	REGISTRATION FEE
Facility Wide	392	Yes	REGISTRATION BY THE DEPARTMENT
Facility Wide	393	Yes	PAYMENT DUE
Facility Wide	400-462	No	PROCEDURES AND REQUIREMENTS FOR TIER II OPERATING PERMITS The facility is not governed by a Tier II operating permit.
Facility Wide	500	No	REGISTRATION PROCEDURES AND REQUIREMENTS FOR PORTABLE EQUIPMENT
Facility Wide	510-516	Yes	STACK HEIGHTS AND DISPERSION TECHNIQUES
Facility Wide	585	Yes	TOXIC AIR POLLUTANTS NON-CARCINOGENIC INCREMENTS (STATE-ONLY)
Facility Wide	586	Yes	TOXIC AIR POLLUTANTS CARCINOGENIC INCREMENTS (STATE-ONLY)
Boilers, Tanks	590	No	NEW SOURCE PERFORMANCE STANDARDS • At present, no NSPS apply to LWP
Facility Wide	591	Yes	NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS
Facility Wide	600	Yes	RULES FOR CONTROL OF OPEN BURNING
Facility Wide	625	Yes	VISIBLE EMISSIONS. • A person shall not emit an air pollutant from any point of emission for a period or periods aggregating more that 3 minutes in any 60-minute period that is greater than 20% opacity. • Prescribes test methods and procedures for performance testing.
Facility Wide	650	Yes	RULES FOR CONTROL OF FUGITIVE DUST.
Facility Wide	651	Yes	GENERAL RULES. • Reasonable precautions shall be taken to prevent particulate matter from becoming airborne.
Boilers	675-681	Yes	FUEL BURNING EQUIPMENT – PARTICULATE MATTER. STANDARDS
Manufacturing Processes	700-703	Yes	PARTICULATE MATTER –PROCESS WEIGHT LIMITATIONS. • Established particulate matter emission limits based on process throughput.
Facility Wide	728	Yes	RULES FOR SULFER CONTENT OF FUELS: DISTILLATE FUEL OIL • Distillate fuel combusted in diesel generators must have a sulfur content of 0.5% or less.
Facility Wide	776	Yes	GENERAL RULES. (state-only) • Odorous gases, liquids or solids shall not be emitted as to cause air pollution.

APPENDIX G

Process Flow Diagrams and Descriptions

G-1 SAWMILL TO KILNS

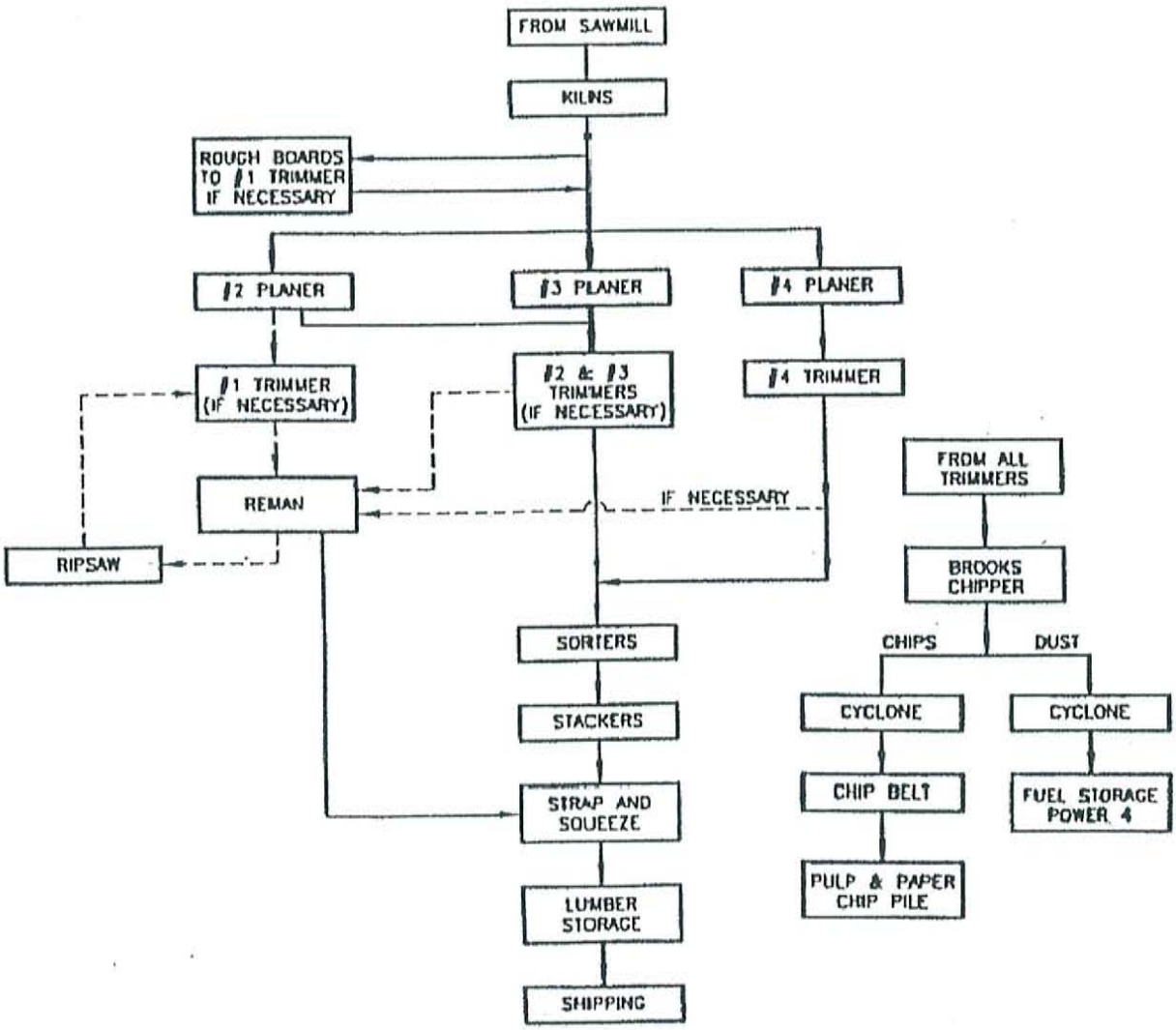
The LWP facility is comprised of the green end (log yard and sawmill), the dry end (surfacing and shipping), and Lewiston Cedar Products (specialties and profile). Cedar and white fir logs come in from various logging operations where they are scaled and kept in the log yard. From the log yard, the logs are sent through the log processing area. While in the log processing area, the logs are de-barked and cut to size. The logs are then sent to various sawing locations throughout the sawmill. These sawing locations include the headrig, the sharp chain, the quad saw, and the horizontal. The logs are sent, via a conveyor system, to the edger and trimmer areas. From the trimmer, the boards are sent to the bin area and the stacker area.


LOG STORAGE
LOG HANDLING
27-INCH INFEED
35-INCH INFEED
DUST FROM ALL MACHINES
27-INCH DEBARKER
35-INCH DEBARKER
50-INCH DEBARKER
CYCLONES 26 & 27
27-INCH CUTOFF SAWS
35-INCH CUTOFF SAWS
HEADRIG
FUEL STORAGE
SHARP CHAIN
HORIZONTAL
#1 OPTIMIZER EDGER
#2 OPTIMIZER EDGER
RBS
CHIPS BELT CONVEYOR
ROTARY GANG
QUAD
PULP & PAPER CHIP PILE
REMAN
2 TRIMMERS
SAWDUST PILE
2 SORTERS
BELT CONVEYOR
2 STACKERS
SAWDUST FROM ALL MACHINES
KILNS

G-2 SURFACING

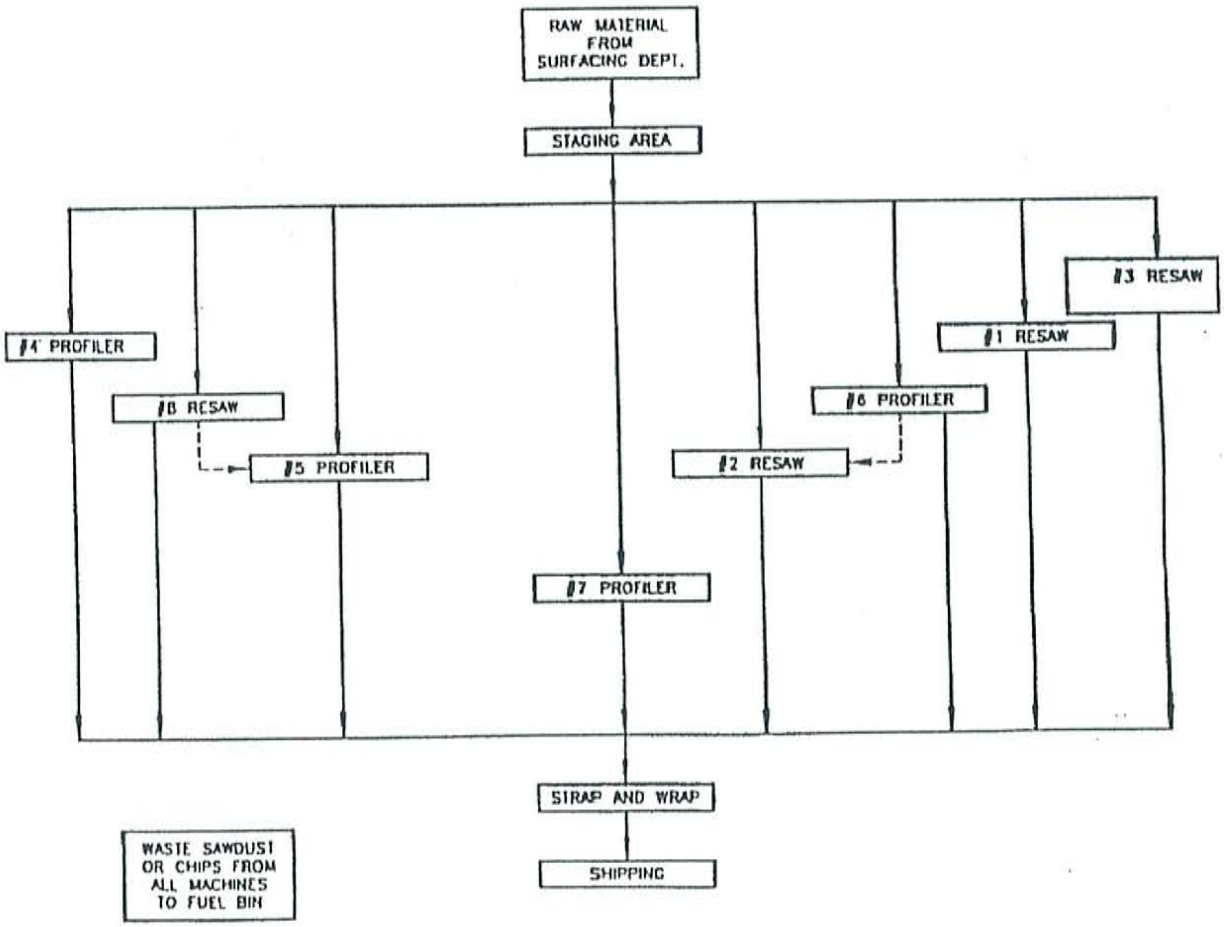
"Green" lumber comes in from the sawmill and is dried in the dry kilns, then sent to the surfacing hoist area. The boards are loaded onto the tilt hoist and lowered onto a conveyor system. From the conveyor system the boards are sent through the planer. Via a conveyor from the planer the boards are transferred to the grading area. The graders grade the boards, after which the boards are trimmed to length. Odd size boards or boards which don't meet the grading standards are rejected and sent to the Reman chain. Trimmed boards are sent to the bins where they are collected, stacked, and then distributed to the package maker. After the boards are packaged they are strapped, wrapped, and sent to the storage sheds.

Note that the #3 Planer has been removed since the development of this flowchart.


FROM SAWMILL
KILNS
ROUGH BOARDS TO #1 TRIMMER IF NECESSARY
#2 PLANER
#3 PLANER
#4 PLANER
#1 TRIMMER (IF NECESSARY)
#2 & #3 TRIMMERS (IF NECESSARY)
#4 TRIMMER
REMAN
IF NECESSARY
RIPSAW
FROM ALL TRIMMERS
BROOKS CHIPPER
CHIPS
DUST
SORTERS
STACKERS
STRAP AND SQUEEZE
LUMBER STORAGE
SHIPPING
CYCLONE
CYCLONE
CHIP BELT
FUEL STORAGE POWER 4
PULP & PAPER CHIP PILE

G-3 PROFILE

"Dry" lumber comes into profile department via carriers from the surfacing area. The lumber is then reprocessed using various sawing, molding, sanding, and planing operations. Boards are shaped to assorted patterns.



G-4 SPECIALTIES

"Shop" lumber comes into the specialties department from surfacing and/or other suppliers. The lumber is then sorted and sent to the planer. From the planer, the boards are sent to the Grecon. While at the Grecon, the boards are marked and cut according to the mark. The cut pieces of board are sent to the Nu-Loc, where they are finger jointed and glued to certain lengths. Selected glued boards are sent to the edge glue molder while others are sent to the sander. From the sander, the finished product is strapped, wrapped, and sent to the sheds for shipping.

APPENDIX H

Baghouse CAM Plans

COMPLIANCE ASSURANCE MONITORING PLAN FOR SURFACING BAGHOUSE 1

I. Background

A. Emissions Unit

Description:	Surfacing Baghouse 1 (west) - 36,000 cfm
Identification:	BH-1
Facility:	Potlatch Forest Products Corporation Lewiston, Idaho

B. Applicable Regulation, Emission Limit, and Pre-CAM Monitoring Requirements

Regulation:	IDAPA 58.01.01.702 (Process Weight Rule)
CAM Emission limits:	See Equations in IDAPA 58.01.01.700

Pre-CAM monitoring requirements: O&M plan, monthly/quarterly monitoring of visible emissions (Method 22) and pressure differential

C. Control Technology, Capture System, Bypass, PTE

Controls:	Pulse-jet baghouse operated under positive pressure.
Capture System:	Closed-duct system.
Bypass:	None
PTE before controls:	> 100 TPY
PTE after controls:	4.05 TPY (0.9 lb/hr for 8,760 hours)

II. Monitoring Approach

A. Indicators

Visible emissions and pressure differential will be used as indicators. Normal production process operations will not produce conditions that adversely affect the baghouse, so no production process operational parameters will be monitored.

B. Measurement Approach

Visible emissions from the baghouse exhaust will be monitored monthly using EPA Reference Method 22. A one-minute observation will be performed and recorded in a log book by the observer. If visible emissions are observed, a six-minute observation using EPA Reference Method 9 will be conducted. The frequency of observation decreases to once per quarter if four consecutive monthly observations are below 20 percent opacity.

Each baghouse is fitted with a magnehelic pressure gauge. The pressure differential will be checked and recorded weekly in tabular or electronic format.

C. Indicator Range

An excursion is defined as the presence of visible emissions or a pressure differential less than 0.5 and greater than 6 inches of water.[1]

D. Performance Criteria

Data Representativeness: Measurements are being made at the emission point (baghouse exhaust).

QA/QC Practices and Criteria: The observer will be familiar with Reference Method 22 and 9.

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[1] Note, however, that freezing weather can cause manometers to produce faulty readings. At ambient temperatures below the freezing point of the manometer fluid, a reading outside of this range will not be considered an excursion.

III. Response to Excursion

A. Upon noting an excursion, the observer will immediately notify maintenance to inspect the baghouse. Maintenance personnel will inspect the baghouse within four hours of receiving notification and make needed repairs as soon as practicable. Operation will return to normal upon completed corrective action.

JUSTIFICATION

I. Background

Baghouse 1 services the surfacing department and collects sawdust. A Torit & Day model RF484 pulse-jet baghouse with 484 bags filters the exhaust gases from the surfacing department at approximately 36,000 acfm. There is no means for the baghouse to be bypassed.

II. Rationale for Selection of Performance Indicators

Visible emissions and pressure differential were selected as the performance indicators because they are indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will not be any visible emissions from the exhaust and the pressure differential will be within the indicator range. Any visible emissions or a substantial change in pressure differential indicates reduced performance of a particulate control device.

III. Rationale for Selection of Indicator Ranges

The selected indicator range is no visible emissions and a pressure drop within the specified range. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. The pressure differential indicator was selected because a significant change in pressure differential is indicative of an upset condition in the baghouse. Upset conditions can lead to increased particulate emissions.

COMPLIANCE ASSURANCE MONITORING PLAN FOR SURFACING BAGHOUSE 2

I. Background

A. Emissions Unit

Description:	Surfacing Baghouse 2 (center) - 38,000 cfm
Identification:	BH-2
Facility:	Potlatch Forest Products Corporation Lewiston, Idaho

B. Applicable Regulation, Emission Limit, and Pre-CAM Monitoring Requirements

Regulation:	IDAPA 58.01.01.702 (Process Weight Rule)
CAM Emission limits:	See Equations in IDAPA 58.01.01.700
Pre-CAM monitoring requirements:	O&M plan, monthly/quarterly monitoring of visible emissions (Method 22) and pressure differential

C. Control Technology, Capture System, Bypass, PTE

Controls:	Pulse-jet baghouse operated under positive pressure.
Capture System:	Closed-duct system.
Bypass:	None
PTE before controls:	> 100 TPY
PTE after controls:	4.3 TPY (1 lb/hr for 8,760 hours)

II. Monitoring Approach

A. Indicators

Visible emissions and pressure differential will be used as indicators. Normal production process operations will not produce conditions that adversely affect the baghouse, so no production process operational parameters will be monitored.

B. Measurement Approach

Visible emissions from the baghouse exhaust will be monitored monthly using EPA Reference Method 22. A one-minute observation will be performed and recorded in a log book by the observer. If visible emissions are observed, a six-minute observation using EPA Reference Method 9 will be conducted. The frequency of observation decreases to once per quarter if four consecutive monthly observations are below 20 percent opacity.

Each baghouse is fitted with a magnehelic pressure gauge. The pressure differential will be checked and recorded weekly in tabular or electronic format.

C. Indicator Range

An excursion is defined as the presence of visible emissions or a pressure differential less than 0.5 and greater than 6 inches of water.[2]

D. Performance Criteria

Data Representativeness: Measurements are being made at the emission point (baghouse exhaust).

QA/QC Practices and Criteria: The observer will be familiar with Reference Method 22 and 9.

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[2] Note, however, that freezing weather can cause manometers to produce faulty readings. At ambient temperatures below the freezing point of the manometer fluid, a reading outside of this range will not be considered an excursion.

III. Response to Excursion

A. Upon noting an excursion, the observer will immediately notify maintenance to inspect the baghouse. Maintenance personnel will inspect the baghouse within four hours of receiving notification and make needed repairs as soon as practicable. Operation will return to normal upon completed corrective action.

JUSTIFICATION

I. Background

Baghouse 2 services the surfacing department and collects sawdust. A Torit & Day model RF484 pulse-jet baghouse with 484 bags filters the exhaust gases from the surfacing department at approximately 38,000 acfm. There is no means for the baghouse to be bypassed.

II. Rationale for Selection of Performance Indicators

Visible emissions and pressure differential were selected as the performance indicators because they are indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will not be any visible emissions from the exhaust and the pressure differential will be within the indicator range. Any visible emissions or a substantial change in pressure differential indicates reduced performance of a particulate control device.

III. Rationale for Selection of Indicator Ranges

The selected indicator range is no visible emissions and a pressure drop within the specified range. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. The pressure differential indicator was selected because a significant change in pressure differential is indicative of an upset condition in the baghouse. Upset conditions can lead to increased particulate emissions.

COMPLIANCE ASSURANCE MONITORING PLAN FOR SURFACING BAGHOUSE 3

I. Background

A. Emissions Unit

Description:	Surfacing Baghouse 3 (east) - 41,000 cfm
Identification:	BH-3
Facility:	Potlatch Forest Products Corporation Lewiston, Idaho

B. Applicable Regulation, Emission Limit, and Pre-CAM Monitoring Requirements

Regulation:	IDAPA 58.01.01.702 (Process Weight Rule)
CAM Emission limits:	See Equations in IDAPA 58.01.01.700
Pre-CAM monitoring requirements:	O&M plan, monthly/quarterly monitoring of visible emissions (Method 22) and pressure differential

C. Control Technology, Capture System, Bypass, PTE

Controls:	Pulse-jet baghouse operated under positive pressure.
Capture System:	Closed-duct system.
Bypass:	None
PTE before controls:	> 100 TPY
PTE after controls:	4.6 TPY (1.1 lb/hr for 8,760 hours)

II. Monitoring Approach

A. Indicators

Visible emissions and pressure differential will be used as indicators. Normal production process operations will not produce conditions that adversely affect the baghouse, so no production process operational parameters will be monitored.

B. Measurement Approach

Visible emissions from the baghouse exhaust will be monitored monthly using EPA Reference Method 22. A one-minute observation will be performed and recorded in a log book by the observer. If visible emissions are observed, a six-minute observation using EPA Reference Method 9 will be conducted. The frequency of observation decreases to once per quarter if four consecutive monthly observations are below 20 percent opacity.

Each baghouse is fitted with a magnehelic pressure gauge. The pressure differential will be checked and recorded weekly in tabular or electronic format.

C. Indicator Range

An excursion is defined as the presence of visible emissions or a pressure differential less than 0.5 and greater than 6 inches of water.[3]

D. Performance Criteria

Data Representativeness: Measurements are being made at the emission point (baghouse exhaust).

QA/QC Practices and Criteria: The observer will be familiar with Reference Method 22 and 9.

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[3] Note, however, that freezing weather can cause manometers to produce faulty readings. At ambient temperatures below the freezing point of the manometer fluid, a reading outside of this range will not be considered an excursion.

III. Response to Excursion

A. Upon noting an excursion, the observer will immediately notify maintenance to inspect the baghouse. Maintenance personnel will inspect the baghouse within four hours of receiving notification and make needed repairs as soon as practicable. Operation will return to normal upon completed corrective action.

JUSTIFICATION

I. Background

Baghouse 3 services the surfacing department and collects sawdust. A Torit & Day model RF484 pulse-jet baghouse with 484 bags filters the exhaust gases from the surfacing department at approximately 41,000 acfm. There is no means for the baghouse to be bypassed.

II. Rationale for Selection of Performance Indicators

Visible emissions and pressure differential were selected as the performance indicators because they are indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will not be any visible emissions from the exhaust and the pressure differential will be within the indicator range. Any visible emissions or a substantial change in pressure differential indicates reduced performance of a particulate control device.

III. Rationale for Selection of Indicator Ranges

The selected indicator range is no visible emissions and a pressure drop within the specified range. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. The pressure differential indicator was selected because a significant change in pressure differential is indicative of an upset condition in the baghouse. Upset conditions can lead to increased particulate emissions.

COMPLIANCE ASSURANCE MONITORING PLAN FOR BAGHOUSE 4 (LEWISTON CEDAR PRODUCTS)

I. Background

A. Emissions Unit

Description:	LCP Baghouse 4 (south) - 45,000 cfm
Identification:	BH-4
Facility:	Potlatch Forest Products Corporation Lewiston, Idaho

B. Applicable Regulation, Emission Limit, and Pre-CAM Monitoring Requirements

Regulation:	IDAPA 58.01.01.702 (Process Weight Rule)
CAM Emission limits:	See Equations in IDAPA 58.01.01.700
Pre-CAM monitoring requirements:	O&M plan, monthly/quarterly monitoring of visible emissions (Method 22) and pressure differential

C. Control Technology, Capture System, Bypass, PTE

Controls:	Pulse-jet baghouse operated under positive pressure.
Capture System:	Closed-duct system.
Bypass:	None
PTE before controls:	> 100 TPY
PTE after controls:	5.1 TPY (1.2 lb/hr for 8,760 hours)

II. Monitoring Approach

A. Indicators

Visible emissions and pressure differential will be used as indicators. Normal production process operations will not produce conditions that adversely affect the baghouse, so no production process operational parameters will be monitored.

B. Measurement Approach

Visible emissions from the baghouse exhaust will be monitored monthly using EPA Reference Method 22. A one-minute observation will be performed and recorded in a log book by the observer. If visible emissions are observed, a six-minute observation using EPA Reference Method 9 will be conducted. The frequency of observation decreases to once per quarter if four consecutive monthly observations are below 20 percent opacity.

Each baghouse is fitted with a magnehelic pressure gauge. The pressure differential will be checked and recorded weekly in tabular or electronic format.

C. Indicator Range

An excursion is defined as the presence of visible emissions or a pressure differential less than 0.5 and greater than 6 inches of water.[4]

D. Performance Criteria

Data Representativeness: Measurements are being made at the emission point (baghouse exhaust).

QA/QC Practices and Criteria: The observer will be familiar with Reference Method 22 and 9.

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[4] Note, however, that freezing weather can cause manometers to produce faulty readings. At ambient temperatures

III. Response to Excursion

A. Upon noting an excursion, the observer will immediately notify maintenance to inspect the baghouse. Maintenance personnel will inspect the baghouse within four hours of receiving notification and make needed repairs as soon as practicable. Operation will return to normal upon completed corrective action.

JUSTIFICATION

I. Background

Baghouse 4 services Lewiston Cedar Products and collects sawdust. A Torit & Day model RF376 pulse-jet baghouse with 376 bags filters the exhaust gases from Lewiston Cedar Products at approximately 45,000 acfm. There is no means for the baghouse to be bypassed.

II. Rationale for Selection of Performance Indicators

Visible emissions and pressure differential were selected as the performance indicators because they are indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will not be any visible emissions from the exhaust and the pressure differential will be within the indicator range. Any visible emissions or a substantial change in pressure differential indicates reduced performance of a particulate control device.

III. Rationale for Selection of Indicator Ranges

The selected indicator range is no visible emissions and a pressure drop within the specified range. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. The pressure differential indicator was selected because a significant change in pressure differential is indicative of an upset condition in the baghouse. Upset conditions can lead to increased particulate emissions.

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below the freezing point of the manometer fluid, a reading outside of this range will not be considered an excursion.

COMPLIANCE ASSURANCE MONITORING PLAN FOR BAGHOUSE 5 (LEWISTON CEDAR PRODUCTS)

I. Background

A. Emissions Unit

Description:	LCP Baghouse 5 (south center) - 43,000 cfm
Identification:	BH-5
Facility:	Potlatch Forest Products Corporation Lewiston, Idaho

B. Applicable Regulation, Emission Limit, and Pre-CAM Monitoring Requirements

Regulation:	IDAPA 58.01.01.702 (Process Weight Rule)
CAM Emission limits:	See Equations in IDAPA 58.01.01.700

Pre-CAM monitoring requirements: O&M plan, monthly/quarterly monitoring of visible emissions (Method 22) and pressure differential

C. Control Technology, Capture System, Bypass, PTE

Controls:	Pulse-jet baghouse operated under positive pressure.
Capture System:	Closed-duct system.
Bypass:	None
PTE before controls:	> 100 TPY
PTE after controls:	4.8 TPY (1.1 lb/hr for 8,760 hours)

II. Monitoring Approach

A. Indicators

Visible emissions and pressure differential will be used as indicators. Normal production process operations will not produce conditions that adversely affect the baghouse, so no production process operational parameters will be monitored.

B. Measurement Approach

Visible emissions from the baghouse exhaust will be monitored monthly using EPA Reference Method 22. A one-minute observation will be performed and recorded in a log book by the observer. If visible emissions are observed, a six-minute observation using EPA Reference Method 9 will be conducted. The frequency of observation decreases to once per quarter if four consecutive monthly observations are below 20 percent opacity.

Each baghouse is fitted with a magnehelic pressure gauge. The pressure differential will be checked and recorded weekly in tabular or electronic format.

C. Indicator Range

An excursion is defined as the presence of visible emissions or a pressure differential less than 0.5 and greater than 6 inches of water.[5]

D. Performance Criteria

Data Representativeness: Measurements are being made at the emission point (baghouse exhaust).

QA/QC Practices and Criteria: The observer will be familiar with Reference Method 22 and 9.

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[5] Note, however, that freezing weather can cause manometers to produce faulty readings. At ambient temperatures below the freezing point of the manometer fluid, a reading outside of this range will not be considered an excursion.

III. Response to Excursion

A. Upon noting an excursion, the observer will immediately notify maintenance to inspect the baghouse. Maintenance personnel will inspect the baghouse within four hours of receiving notification and make needed repairs as soon as practicable. Operation will return to normal upon completed corrective action.

JUSTIFICATION

I. Background

Baghouse 5 services Lewiston Cedar Products and collects sawdust. A Torit & Day model RF376 pulse-jet baghouse with 376 bags filters the exhaust gases from Lewiston Cedar Products at approximately 43,000 acfm. There is no means for the baghouse to be bypassed.

II. Rationale for Selection of Performance Indicators

Visible emissions and pressure differential were selected as the performance indicators because they are indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will not be any visible emissions from the exhaust and the pressure differential will be within the indicator range. Any visible emissions or a substantial change in pressure differential indicates reduced performance of a particulate control device.

III. Rationale for Selection of Indicator Ranges

The selected indicator range is no visible emissions and a pressure drop within the specified range. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. The pressure differential indicator was selected because a significant change in pressure differential is indicative of an upset condition in the baghouse. Upset conditions can lead to increased particulate emissions.

COMPLIANCE ASSURANCE MONITORING PLAN FOR BAGHOUSE 6 (LEWISTON CEDAR PRODUCTS)

I. Background

A. Emissions Unit

Description:	LCP Baghouse 6 (north center) - 35,000 cfm
Identification:	BH-6
Facility:	Potlatch Forest Products Corporation Lewiston, Idaho

B. Applicable Regulation, Emission Limit, and Pre-CAM Monitoring Requirements

Regulation:	IDAPA 58.01.01.702 (Process Weight Rule)
CAM Emission limits:	See Equations in IDAPA 58.01.01.700
Pre-CAM monitoring requirements:	O&M plan, monthly/quarterly monitoring of visible emissions (Method 22) and pressure differential

C. Control Technology, Capture System, Bypass, PTE

Controls:	Pulse-jet baghouse operated under positive pressure.
Capture System:	Closed-duct system.
Bypass:	None
PTE before controls:	> 100 TPY
PTE after controls:	3.9 TPY (0.9 lb/hr for 8,760 hours)

II. Monitoring Approach

A. Indicators

Visible emissions and pressure differential will be used as indicators. Normal production process operations will not produce conditions that adversely affect the baghouse, so no production process operational parameters will be monitored.

B. Measurement Approach

Visible emissions from the baghouse exhaust will be monitored monthly using EPA Reference Method 22. A one-minute observation will be performed and recorded in a log book by the observer. If visible emissions are observed, a six-minute observation using EPA Reference Method 9 will be conducted. The frequency of observation decreases to once per quarter if four consecutive monthly observations are below 20 percent opacity.

Each baghouse is fitted with a magnehelic pressure gauge. The pressure differential will be checked and recorded weekly in tabular or electronic format.

C. Indicator Range

An excursion is defined as the presence of visible emissions or a pressure differential less than 0.5 and greater than 6 inches of water.[6]

D. Performance Criteria

Data Representativeness:Measurements are being made at the emission point (baghouse exhaust).

QA/QC Practices and Criteria: The observer will be familiar with Reference Method 22 and 9.

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[6] Note, however, that freezing weather can cause manometers to produce faulty readings. At ambient temperatures below the freezing point of the manometer fluid, a reading outside of this range will not be considered an excursion.

III. Response to Excursion

A. Upon noting an excursion, the observer will immediately notify maintenance to inspect the baghouse. Maintenance personnel will inspect the baghouse within four hours of receiving notification and make needed repairs as soon as practicable. Operation will return to normal upon completed corrective action.

JUSTIFICATION

I. Background

Baghouse 6 services Lewiston Cedar Products and collects sawdust. A Torit & Day model RF376 pulse-jet baghouse with 376 bags filters the exhaust gases from Lewiston Cedar Products at approximately 35,000 acfm. There is no means for the baghouse to be bypassed.

II. Rationale for Selection of Performance Indicators

Visible emissions and pressure differential were selected as the performance indicators because they are indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will not be any visible emissions from the exhaust and the pressure differential will be within the indicator range. Any visible emissions or a substantial change in pressure differential indicates reduced performance of a particulate control device.

III. Rationale for Selection of Indicator Ranges

The selected indicator range is no visible emissions and a pressure drop within the specified range. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. The pressure differential indicator was selected because a significant change in pressure differential is indicative of an upset condition in the baghouse. Upset conditions can lead to increased particulate emissions.

COMPLIANCE ASSURANCE MONITORING PLAN FOR LEWISTON CEDAR PRODUCTS BAGHOUSE 7

I. Background

A. Emissions Unit

Description:	LCP Baghouse 7 (north) - 33,000 cfm
Identification:	BH-7
Facility:	Potlatch Forest Products Corporation Lewiston, Idaho

B. Applicable Regulation, Emission Limit, and Pre-CAM Monitoring Requirements

Regulation:	IDAPA 58.01.01.702 (Process Weight Rule)
CAM Emission limits:	See Equations in IDAPA 58.01.01.700
Pre-CAM monitoring requirements:	O&M plan, monthly/quarterly monitoring of visible emissions (Method 22) and pressure differential

C. Control Technology, Capture System, Bypass, PTE

Controls:	Pulse-jet baghouse operated under positive pressure.
Capture System:	Closed-duct system.
Bypass:	None
PTE before controls:	> 100 TPY
PTE after controls:	3.7 TPY (0.8 lb/hr for 8,760 hours)

II. Monitoring Approach

A. Indicators

Visible emissions and pressure differential will be used as indicators. Normal production process operations will not produce conditions that adversely affect the baghouse, so no production process operational parameters will be monitored.

B. Measurement Approach

Visible emissions from the baghouse exhaust will be monitored monthly using EPA Reference Method 22. A one-minute observation will be performed and recorded in a log book by the observer. If visible emissions are observed, a six-minute observation using EPA Reference Method 9 will be conducted. The frequency of observation decreases to once per quarter if four consecutive monthly observations are below 20 percent opacity.

Each baghouse is fitted with a magnehelic pressure gauge. The pressure differential will be checked and recorded weekly in tabular or electronic format.

C. Indicator Range

An excursion is defined as the presence of visible emissions or a pressure differential less than 0.5 and greater than 6 inches of water.[7]

D. Performance Criteria

Data Representativeness: Measurements are being made at the emission point (baghouse exhaust).

QA/QC Practices and Criteria: The observer will be familiar with Reference Method 22 and 9.

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[7] Note, however, that freezing weather can cause manometers to produce faulty readings. At ambient temperatures below the freezing point of the manometer fluid, a reading outside of this range will not be considered an excursion.

III. Response to Excursion

A. Upon noting an excursion, the observer will immediately notify maintenance to inspect the baghouse. Maintenance personnel will inspect the baghouse within four hours of receiving notification and make needed repairs as soon as practicable. Operation will return to normal upon completed corrective action.

JUSTIFICATION

I. Background

Baghouse 7 services Lewiston Cedar Products and collects sawdust. A Torit & Day model RF376 pulse-jet baghouse with 376 bags filters the exhaust gases from Lewiston Cedar Products at approximately 33,000 acfm. There is no means for the baghouse to be bypassed.

II. Rationale for Selection of Performance Indicators

Visible emissions and pressure differential were selected as the performance indicators because they are indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will not be any visible emissions from the exhaust and the pressure differential will be within the indicator range. Any visible emissions or a substantial change in pressure differential indicates reduced performance of a particulate control device.

III. Rationale for Selection of Indicator Ranges

The selected indicator range is no visible emissions and a pressure drop within the specified range. When an excursion occurs, corrective action will be initiated, beginning with an evaluation of the occurrence to determine the action required to correct the situation. All excursions will be documented and reported. An indicator range of no visible emissions was selected because: (1) an increase in visible emissions is indicative of an increase in particulate emissions; and (2) a monitoring technique which does not require a Method 9 certified observer is desired. The pressure differential indicator was selected because a significant change in pressure differential is indicative of an upset condition in the baghouse. Upset conditions can lead to increased particulate emissions.