



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

July 29, 2005

Certified Mail No. 7000 1670 0013 8128 2343

Michael Scott Atkison
Bennett Forest Industries
Rt. 1, Box 2L
Grangeville, ID 83530

RE: Facility ID No. 049-00003, Bennett Forest Industries, Grangeville
Final Permit Letter

Dear Mr. Atkison:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-040214 for Bennett Forest Industries in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on November 10, 2004 and on revised information received on January 17, 2005, February 2, 2005, April 21, 2005, and May 17, 2005. This permit is effective immediately and replaces the Wickes Forest Industries Permit to Construct No. 0740-0003, issued September 17, 1980, which is the facility's currently effective permit. This permit does not release Bennett Forest Industries from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Lewiston Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Dan Pitman at (208) 373-0500 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/DP/sd
Enclosures

Permit No. P-040214



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-040214

FACILITY ID No.: 049-00003

AQCR: 63

CLASS: SM

SIC: 2421

ZONE: 11

UTM COORDINATE (km): 566.2, 5087.7

1. PERMITTEE

Bennett Forest Industries

2. PROJECT

Permit to Construct (Synthetic Minor)

3. MAILING ADDRESS

Rt. 1 Box 2L

CITY

Grangeville

STATE

ID

ZIP

83530

4. FACILITY CONTACT

Michael Scott Atkison

TITLE

CEO

TELEPHONE

(208) 983-0012

5. RESPONSIBLE OFFICIAL

Michael Scott Atkison

TITLE

CEO

TELEPHONE

(208) 983-0012

6. EXACT PLANT LOCATION

Highway 95, milepost 240.8

COUNTY

Idaho

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Sawmill – dimensional lumber

8. PERMIT AUTHORITY

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.


TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 29, 2005

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr/dscf	grain (1 lb = 7,000 grains) per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
lb/mbf	pounds of emissions per thousand board feet of lumber
mbf	thousand board feet of lumber
MMBtu	million British thermal units
MMBtu/hr	million British thermal units per hour
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SM	synthetic minor
T/R	transformer/rectifier
T/yr	tons per year
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER P-040214

Permittee:	Bennett Forest Industries	Facility ID No.: 049-00003	Date Issued:	July 29, 2005
Location:	Grangeville, Idaho			

1. PERMIT SCOPE

Purpose

- 1.1 The purpose of this permit to construct (PTC) is to limit facility emissions below major facility classification for Tier I operating permit requirements and to protect ambient air quality standards.
- 1.2 This PTC replaces PTC No. 0740-0003, issued September 17, 1980 to Wickes Forest Industries, the terms and conditions of which shall no longer apply.

Regulated Sources

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	<u>Hog fuel boiler</u> Manufacturer: Wellons Model No.: 2DS2C8.0A Rated steam rate: 80,000 pounds per hour Fuel value: 8,750 Btu per dry pound	<u>Multiclone</u> Manufacturer: Wellons Model No.: W-144 Air flow rate: 64,500 CFM at sea level & 350 °F. <u>Electrostatic precipitator</u> Manufacturer: Wellons Model No.: Size No. 9 No. of T/R sets: 2
4	<u>Dry kilns (3)</u> P1, P2, and P3 Manufacturer: LSI Length: 88 feet	Uncontrolled

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2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

Performance Testing

- 2.11 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

Monitoring and Recordkeeping

- 2.12 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least two years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

Reports and Certifications

- 2.13 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

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

Fax: (208) 799-3451

Fuel-burning Equipment

- 2.14 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

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3. HOG FUEL BOILER

3.1 Process Description

The Wellons hog fuel-fired boiler supplies up to 80,000 pounds per hour of steam to three kilns which are used to dry lumber. The rated heat input capacity of the boiler is 115 million Btu/hr.

3.2 Emission Control Description

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

Table 3.1 HOG FUEL BOILER DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device
Hog fuel boiler	Multiclone and electrostatic precipitator

Emission Limits

3.3 CO Emission Limits

Carbon monoxide (CO) emissions from the boiler shall not exceed 14.25 pounds per hour (lb/hr) or 49.9 tons per any consecutive 12-month period (T/yr).

3.4 Particulate Matter Emission Limit in Accordance with 40 CFR 60.43b(c)(1)

Particulate matter emissions from the boiler shall not exceed 0.1 pounds per million Btu of heat input in accordance with 40 CFR 60.43b (c) (1). Compliance shall be determined by a performance test as specified in 40 CFR 60.8.

3.5 Opacity Limits

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

The particulate matter and opacity standards apply at all times, except during periods of startup, shutdown or malfunction in accordance with 40 CFR 60.43b(g).

Operating Requirements

3.6 Fuel Type

The permittee shall fire the boiler exclusively with wood products.

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3.7 Steaming Rate Limits

The amount of steam produced by the boiler shall not exceed 1.0 million pounds of steam per day or 295 million pounds of steam per any consecutive 12-month period.

3.8 Control Device Requirements

3.8.1 A multiclone and an ESP shall be used to control PM and PM₁₀ emissions from the boiler. The multiclone and the ESP shall be maintained in good working order and operated as efficiently as practical in accordance with the Operations and Maintenance (O&M) manual specifications required by Permit Condition 3.15 and General Provision 5.2.

3.8.2 For the ESP, the permittee shall install, calibrate, maintain, and operate, in accordance with the O&M manual specifications, equipment to continuously measure the secondary voltage and amperage applied by each transformer/rectifier (T/R) set to the discharge electrodes. The three-hour average power input shall be recorded each hour as specified in Permit Condition 3.14 to demonstrate compliance with Permit Condition 3.8.3.

3.8.3 The power applied by each T/R set to the discharge electrodes on the ESP shall be maintained within O&M manual specifications. The three-hour average power input shall not be less than the three-hour average power input limit established by Permit Condition 3.13.2. Documentation of O&M manual power input specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

3.9 Continuous Opacity Monitoring System

3.9.1 For the boiler, the permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system in accordance with 40 CFR 60.48b(a).

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

Monitoring and Recordkeeping Requirements

3.10 Steam and Fuel Monitoring and Recordkeeping Requirements

3.10.1 The permittee shall monitor and record the total steam in pounds produced by the boiler each day, each month, and for the most recent 12-month period. Records shall be kept on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

3.10.2 The permittee shall monitor and record the amount of fuel combusted during each day, each month, and for the most recent 12-month period in accordance with 40 CFR 60.49b(d) unless EPA provides written authorization for an alternative.

3.10.3 The permittee shall calculate, using the records of the daily amount of fuel combusted, the annual capacity factor for wood for the reporting period in accordance with 40 CFR 60.49b(d) unless EPA provides written authorization for an alternative. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.

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3.11 Opacity Recordkeeping in Accordance with 40 CFR 60.49b(f)

The permittee shall maintain records of opacity in accordance with 40 CFR 60.49b(f).

3.12 CO Performance Test

The permittee shall conduct a performance test to measure CO emissions from the boiler within 180 days of commencement of operation of the boiler. The performance testing will be conducted to demonstrate compliance with the emission rate limit listed in Permit Condition 3.3.

The performance test shall be performed in accordance with IDAPA 58.01.01.157. The amount of steam produced by the boiler shall be recorded during the performance test. In addition, a fuel analysis shall be conducted of a representative sample of the fuel combusted in the boiler during the performance test.

3.13 PM Compliance Testing Requirements

3.13.1 Within 60 days after achieving the maximum production rate at which the boiler will be operated, but not later than 180 days after initial startup of the boiler and at such other times as may be required by the Environmental Protection Agency (EPA) under section 114 of the Act, the permittee shall conduct performance test(s) and furnish the EPA a written report of the results of such performance test(s) in accordance with 40 CFR 60.8. The permittee shall also provide a copy of the results of any testing done per this permit condition to DEQ in accordance with Permit Condition 2.13.

The performance testing is to determine compliance with the particulate matter emissions limits and opacity specified in Permit Conditions 3.4 and 3.5.

3.13.2 The permittee shall conduct a particulate matter compliance test in accordance with Permit Condition 2.11. The compliance test shall be conducted within six months of issuance of this permit to demonstrate compliance with Permit Conditions 2.7 and 2.14 and to establish the minimum three hour average power input (secondary voltage and current) for each ESP transformer/rectifier set to assure continuous compliance with Permit Conditions 2.7 and 2.14. The minimum three hour average power input shall be the three-hour average of the power input during the performance test.

3.13.3 After the initial performance test, future testing shall be performed according to the following schedule. If the PM emission rate measured in the most recent test is less than or equal to 75% of the emission standard in Permit Condition 2.14, the next test shall be conducted within five years of the test date. If the PM emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 2.14, the next test shall be conducted within two years of the test date. If the PM emission rate measured during the most recent performance test is greater than 90% of the emission standard in Permit Condition 2.14, the next test shall be conducted within one year of the test date. Subsequent source testing shall be conducted based on these criteria for the duration of the permit term.

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3.13.4 The permittee shall monitor and record the following information during each compliance test:

- Visible emissions, using the methods and procedures contained in IDAPA 58.01.01.625
- Wood-waste fuel analysis
- Amount of steam produced in pounds
- Power input to each T/R set of the ESP (the sum of the secondary voltage times secondary current)

3.14 Monitoring Requirement

When the boiler is operating, the permittee shall monitor and record on an hourly basis the secondary voltage and amperage applied by each T/R set to the discharge electrodes. Each hour, the three hour average power input shall be determined and recorded. The voltage and amperage recorded shall be consistent with O&M manual units of measure. A compilation of the most recent two years of voltage and amperage records shall be kept at the facility and shall be made available to DEQ representatives upon request.

3.15 Operations and Maintenance Manual Requirements

Operation and Maintenance manuals shall be developed for the boiler, the multiclone, and the ESP within 60 days of issuance of this permit. The permittee shall have developed an O&M manual for the multiclone and the ESP according to manufacturer specifications and recommendations. This manual shall describe the methods and procedures that will be followed to assure the boiler, multiclone, and the ESP are maintained in good working order and operated as efficiently as practical. The O&M manuals shall be updated as necessary and shall include, at a minimum, the most recent general descriptions of the equipment; the normal operating conditions and procedures for the boiler; startup, shutdown, and maintenance procedures; upset conditions guidelines; and corrective action procedures. After performance testing is completed in accordance with Permit Condition 2.11 and 3.13 which determines the minimum secondary power (voltage and current) for each of the T/R sets, this minimum power setting shall be specified in the O&M manual for the ESP.

Reporting Requirements

3.16 Compliance Test Protocol

The permittee is strongly encouraged to submit a compliance test protocol for approval at least 30 days prior to conducting any compliance test required by Permit Conditions 3.12 and 3.13. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the test does not satisfy the testing requirements.

3.17 Compliance Test Report

The permittee shall submit a report of the results of any compliance test and the results of any fuel analysis required in Permit Conditions 3.12 and 3.13, including all required process data, to DEQ within 30 days after the date on which any required compliance test is concluded, in accordance with IDAPA 58.01.01.157.

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4. KILNS (3)

4.1 Process Description

The three kilns are used to dry lumber.

4.2 Emission Control Description

The emissions from the kilns are uncontrolled.

Emission Limits

4.3 HAP Emission Limits

Formaldehyde emissions from the kilns shall not exceed a total from all kilns combined of 144.3 pounds per any consecutive 12-month period (lb/yr). Table 4.1 shows the emission factors that shall be used to calculate emissions. Compliance shall be demonstrated for any consecutive 12-month period using the emission factors specified in Table 4.1 and the throughput of corresponding type of wood dried using the following equation:

$$Formaldehyde = \sum_{i=1}^n (X_i \times Y_i)$$

Where:

- Formaldehyde = Emissions of formaldehyde per month (lb/mo)
- n = Number of types of wood dried
- X_i = Throughput, in mbf, of lumber of type i dried per month (lb/mo)
- Y_i = Emission factor for lumber of type i

Table 4.1 ANNUAL FORMALDEHYDE LIMIT

Type of wood dried	Formaldehyde	
	Emission Factor (lb/mbf)	Annual Limit (lb/yr)
Ponderosa	0.0029	144.3
White Fir	0.0028	
Lodgepole	0.0040	
Douglas Fir	0.0010	

Operating Requirements

4.4 Throughput Limits

The throughput through the kilns shall not exceed 60 million board feet per any consecutive 12-month period.

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Monitoring and Recordkeeping Requirements

4.5 Monitoring Requirement

Each month, the permittee shall monitor and record the throughput of the kilns for that month and for the most recent 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.

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5. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

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Location:	Grangeville, Idaho			

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.