



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor  
Toni Hardesty, Director

April 24, 2008

**Certified Mail No. 7190 0596 0014 0000 2635**

Sue Somers, Environmental Engineering Manager  
Potlatch Forest Products Corporation  
P.O. Box 1126  
Lewiston, Idaho 83501

RE: Facility ID No. 069-00001, Potlatch Forest Products Corporation, Lewiston  
Final Permit Letter

Dear Ms. Somers:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2008.0009 to Potlatch Forest Products Corporation for a boiler input rating correction at the Lewiston facility, 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 January 23, 2008. This permit is effective immediately and replaces PTC No. P-050208, issued on November 9, 2006, the terms and conditions of which no longer apply. This permit does not release Potlatch Forest Products Corporation from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

As you requested, the permit to construct will be incorporated into the Tier I operating permit at the time of renewal.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Lewiston Regional Office, 1118 F Street, Lewiston, ID 83501.

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 contact Dan Pitman at (208) 373-0502 or [daniel.pitman@deq.idaho.gov](mailto:daniel.pitman@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

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

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\DP\hp

Project No. P-2008.0009

Enclosures

Potlatch Forest Products Corporation, Lewiston  
April 24, 2008  
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HARD COPY TO FACILITY

en: Hudson Mann/Clayton Steele, Lewiston Regional Office  
Dan Pitman, Permit Writer  
Marilyn Seymore/ Pat Rayne, AQ Division  
Stationary Source Administrative Assistant

en-web: Laurie Kral, U.S. EPA Region 10

ec: Sue Somers, Sue.Somers@potlatchcorp.com

c: Reading File (Ltr Only)  
Source File  
Permit Binder  
Bill Rogers, Permit Coordinator (Ltr Only)  
Phyllis Heitman, AQ Division (Ltr Only)



**Air Quality**  
**PERMIT TO CONSTRUCT**  
 State of Idaho  
 Department of Environmental Quality

**PERMIT No.:** P- 2008.0009  
**FACILITY ID No.:** 069-00001  
**AQCR:** 062                      **CLASS:** A  
**SIC:** 2812                      **ZONE:** 11  
**UTM COORDINATE (km):** 501.9, 5141.3

**1. PERMITTEE**

Potlatch Forest Products Corporation, Pulp and Paperboard Division

**2. PROJECT**

Package Boilers

**3. MAILING ADDRESS**

P.O. Box 1126

**CITY**

Lewiston

**STATE**

ID

**ZIP**

83501-1126

**4. FACILITY CONTACT**

Sue Somers

**TITLE**

Environmental Engineering Manager

**TELEPHONE**

(208) 799-4104

**5. RESPONSIBLE OFFICIAL**

Frank Radle

**TITLE**

Plant Manager

**TELEPHONE**

(208) 799-1561

**6. EXACT PLANT LOCATION**

803 Mill Road, Lewiston, Idaho

**COUNTY**

Nez Perce

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Pulp and paperboard manufacturing

**8. PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, 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 has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

DAN PITMAN, PERMIT WRITER  
 DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM  
 MANAGER  
 DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE MODIFIED/REVISED:**

April 24, 2008

**DATE ISSUED:**

November 9, 2006

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## Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
hr	hour
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
MMBtu	million British thermal units
MMscf	million standard cubic feet
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
scf	standard cubic feet
SIC	Standard Industrial Classification
SO <sub>2</sub>	Sulfur Dioxide
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0009**

**Permittee:** Potlatch Forest Products Corporation  
**Location:** Lewiston, Idaho

**Facility ID No. 069-00001**

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

- 1.1 The purpose of this permit is to correct the maximum rated input capacity of one of the permitted boilers from 269 MMBtu/hr to 250 MMBtu/hr. The monitoring requirements of 40 CFR 52.21 (PSD Regulations) included in the permit have also been updated to those that were promulgated after the initial permit issuance.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
- 1.3 This PTC replaces PTC No. P-050208, issued on November 9, 2006, the terms and conditions of which shall no longer apply.

***Regulated Sources***

- 1.4 Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

Permit Section	Source Description	Emissions Control(s)
2	<u>Two Package Boilers</u> Maximum Heat Input: One boiler shall be less than or equal to 250 MMBtu/hr and the other boiler shall be less than or equal to 336 MMBtu/hr Fuels: Natural gas	None

**[April 24, 2008]**

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**Permittee:** Potlatch Forest Products Corporation  
**Location:** Lewiston, Idaho

**Facility ID No. 069-00001**

**2. TWO PACKAGE BOILERS**

**2.1 Process Description**

The two Package Boilers produce steam for production operations at the Potlatch facility in Lewiston.

**2.2 Emissions Control Description**

**Table 2.1 EMISSIONS UNIT DESCRIPTIONS**

Emissions Unit(s) / Process(es)	Emissions Control Device
Package Boiler with a rated heat input capacity less than or equal to 250 MMBtu/hr	None
Package Boiler with a rated heat input capacity less than or equal to 336 MMBtu/hr	None

**[April 24, 2008]**

***Emissions Limits***

**2.3 Opacity Limit**

Emissions from the stacks of each Package Boiler shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

**2.4 NSPS Requirements - Package Boilers**

For each Package Boiler, the permittee shall comply with the emission standards and other requirements under 40 CFR Part 60 Subpart A and Subpart D, Db or Dc, if the boiler is an affected facility under the Subpart. The permittee shall submit all required notifications to the address given below.

Lewiston Regional Office  
Department of Environmental Quality  
1118 F Street  
Lewiston, ID 83501

**[April 24, 2008]**

***Operating Requirements***

**2.5 Boiler Replacements**

2.5.1 The permittee shall permanently discontinue operation of the existing power boiler which is being replaced on or before the date any replacement boiler (Package Boiler) begins operation at the facility. If the replaced power boiler is proposed to be brought back into operation after replacement, it shall be considered a new emissions unit and shall be subject to permitting in accordance with IDAPA 58.01.01.200.

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**Facility ID No. 069-00001**

2.5.2 The permittee may replace the power boilers multiple times provided each replacement is in compliance with the requirements of this permit and:

- The replacement boiler project(s) do not exceed a significant emission increase as determined by the methods specified by 40 CFR 52.21(a)(2)(iv)(c);
- The replacement boiler is identical to or functionally equivalent to the replaced boiler in accordance with 40 CFR 52.21(b)(33)(ii);
- The replacement boiler does not have maximum hourly heat input and maximum hourly fuel consumption design rate greater than the replaced boiler in accordance with 40 CFR 52.21(b)(33); and
- The permittee complies with any applicable notification requirements of Permit Condition 2.10.

[April 24, 2008]

**2.6 Maximum Heat Input Capacity of the Two Package Boilers**

The rated heat input capacity of one of the Package Boilers shall be less than or equal to 250 MMBtu/hr. The rated heat input capacity of the other Package Boiler shall be less than or equal to 336 MMBtu/hr.

[April 24, 2008]

**2.7 Fuel Types**

Each Package Boiler shall be fired with natural gas exclusively.

***Monitoring and Recordkeeping Requirements***

**2.8 NO<sub>x</sub> and CO Performance Tests - Package Boilers**

For each Package Boiler, within 60 days of achieving the maximum production rate of the boiler but not later than 180 days after initial startup of the boiler, the permittee shall conduct a performance test to measure NO<sub>x</sub> and CO emissions from the boiler stack. The tests shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Methods 7 and 10, or a DEQ-approved alternative. If the boiler is subject to 40 CFR Part 60 Subpart D, Db or Dc, the NO<sub>x</sub> test may be conducted in accordance with the applicable method under the subpart. For tests conducted on-site, the initial performance test and any subsequent performance tests conducted to demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157. Test report information from a test(s) conducted on the boiler within five years prior to installation at the facility (e.g., an off-site test to meet requirements under 40 CFR Part 60) may be submitted to satisfy this permit condition; and for such tests, in order to satisfy IDAPA 58.01.01.157, only the requirements of IDAPA 58.01.01.157.02 must be met. In addition, the following information shall be recorded during each performance test run and included in the performance test report (for a test conducted prior to installing the boiler, information items below may be waived with DEQ approval):

- Manufacturer's name, model number, serial number and rated heat input capacity of the boiler;
- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- The fuel consumption shall be recorded in units of MMBtu/hr and MMscf/hr;

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- Visible emissions shall be observed and recorded using the methods specified in IDAPA 58.01.01.625; and

The measured NO<sub>x</sub> and CO emission rate shall be reported in units of pounds per hour, pounds per MMBtu of heat input to the boiler and in units of pounds per MMscf of natural gas input to the boiler. All calculations used to convert the test results into these units shall be provided in the test report.

**2.9 NSR Projected Emissions Records**

The purpose of this section of the permit is to summarize the source's obligation for record keeping in accordance with 40 CFR 52.21(r)(6). Should there be a conflict between this permit section and 40 CFR 52.21(r)(6), 40 CFR 52.21(r)(6) shall govern.

In accordance with 40 CFR 52.21(r)(6), for any Package Boiler replacement, the permittee shall maintain records and provide reports in accordance with IDAPA 58.01.01.205.01 [40 CFR 52.21(r)(6) and (7)]:

2.9.1 In accordance with 40 CFR 52.21(r)(6)(i), before beginning actual construction of the project, the owner or operator shall document and maintain a record of the following information:

- (a) A description of the project;
- (b) Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the project; and
- (c) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions and the projected actual emissions.

2.9.2 In accordance with 40 CFR 52.21(r)(6)(iii), the owner or operator shall monitor the emissions of NSR regulated pollutants that could increase as a result of the project (e.g. CO, NO<sub>x</sub>, PM, PM<sub>10</sub>, SO<sub>2</sub> and VOC); and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five years following resumption of regular operations after the change.

These records shall include but not be limited to calculations of emissions based on the results of the performance tests conducted in accordance with Permit Condition 2.8.

2.9.3 In accordance with 40 CFR 52.21(r)(6)(v), the owner or operator shall submit a report to DEQ and the EPA Administrator if the emissions, in tons per calendar year, from the project identified under Permit Condition 2.9.1 exceed the baseline actual emissions (as documented and maintained pursuant to Permit Condition 2.9.1(c)) by a significant amount (as defined in 40 CFR 52.21(b)(23)) for that regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented and maintained pursuant to Permit Condition 2.9.1(c). Such report shall be submitted to DEQ and the EPA Administrator within 60 days after the end of such year.

2.9.4 In accordance with 40 CFR 52.21(r)(6)(v), the report shall contain the following:

- (a) The name, address and telephone number of the major stationary source;
- (b) The annual emissions as calculated pursuant to Permit Condition 2.9.2; and
- (c) Any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

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2.9.5 In accordance with 40 CFR 52.21(r)(7) the information be documented and maintained pursuant to Permit Conditions 2.9.1 through 2.9.4 shall be made available for review upon request for inspection by DEQ, the EPA Administrator or the general public pursuant to the requirements contained in 40 CFR 70.4(b)(3)(viii). The most recent five years' compilation of data shall be kept on site for this purpose.

**[April 24, 2008]**

### ***Reporting Requirements***

#### **2.10 Notifications - Package Boilers**

Within 60 days after commencing operation of each replacement boiler (Package Boiler), including the initial installation and each subsequent installation, the permittee shall submit the following information to DEQ in accordance with IDAPA 58.01.01.211.01:

- manufacturer and model number
- date of manufacture
- maximum heat input capacity in MMBtu/hr
- a determination showing whether or not requirements under 40 CFR Part 60 apply to the boiler

If records are required to be prepared in accordance with Permit Condition 2.9, submit a copy of the records for each boiler replacement project to:

Lewiston Regional Office  
Department of Environmental Quality  
1118 F Street  
Lewiston, ID 83501

**[April 24, 2008]**

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<b>Location:</b>	Lewiston, Idaho	

**3. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

***General Compliance***

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.  

**[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.  

**[IDAPA 58.01.01.211, 5/1/94]**
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.  

**[IDAPA 58.01.01.212.01, 5/1/94]**

***Inspection and Entry***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

**[Idaho Code §39-108]**

***Construction and Operation Notification***

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
  - a. A notification of the date of initiation of construction, within five working days after occurrence;
  - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

**[IDAPA 58.01.01.211, 5/1/94]**

***Performance Testing***

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.

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.

**[IDAPA 58.01.01.157, 4/5/00]**

***Monitoring and Recordkeeping***

7. 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 five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records 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.

**[IDAPA 58.01.01.211, 5/1/94]**

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0009**

**Permittee:** Potlatch Forest Products Corporation

**Facility ID No.** 069-00001

**Location:** Lewiston, Idaho

***Excess Emissions***

8. 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.

**[IDAPA 58.01.01.130-136, 4/5/00]**

***Certification***

9. 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.

**[IDAPA 58.01.01.123, 5/1/94]**

***False Statements***

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

**[IDAPA 58.01.01.125, 3/23/98]**

***Tampering***

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

**[IDAPA 58.01.01.126, 3/23/98]**

***Transferability***

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

**[IDAPA 58.01.01.209.06, 4/11/06]**

***Severability***

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

**[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]**