



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR
TONI HARDESTY, DIRECTOR

August 25, 2006

Certified Mail No. 7005 1160 0000 1550 7244

Henry Ricklefs
Plum Creek Northwest Lumber, Inc.
P. O. Box 674
Meridian, ID 83705

RE: Facility ID No. 001-00091, Plum Creek Northwest Lumber, Inc., Meridian
Final Permit Letter

Dear Mr. Ricklefs:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-060020 to Plum Creek Northwest Lumber, Inc., 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 May 12, 2006. This permit does not release Plum Creek Northwest Lumber, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Boise 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 Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/TD/bf

Permit No. P-060020

Enclosures

c: **Leonard Herr, Boise Regional Office**
 Bill Rogers, Permit Coordinator
 Tracy Drouin, Permit Writer
 Marilyn Seymore/ Pat Rayne, Air Quality Division
 Permit Binder
 Source File
 Phyllis Heitman (Ltr Only)
 Reading File (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-060020

FACILITY ID No.: 001-00091

AQCR: 64

CLASS: SM

SIC: 2499

ZONE: 11

UTM COORDINATE (km): 548.67, 4828.22

1. PERMITTEE

Plum Creek Northwest Lumber, Inc.

2. PROJECT

Permit to Construct – New cyclone and hours of operation limit removal

3. MAILING ADDRESS

P.O. Box 674

CITY

Boise

STATE

ID

ZIP

83705

4. FACILITY CONTACT

Mitchell Leu

TITLE

Environmental Engineer

TELEPHONE

(406) 892-6217

5. RESPONSIBLE OFFICIAL

Henry Ricklefs

TITLE

Vice President of Manufacturing

TELEPHONE

(208) 288-3232

6. EXACT PLANT LOCATION

240 Taylor Avenue, Meridian, Idaho

COUNTY

Ada

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Wood Products

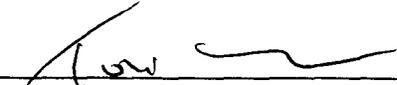
8. GENERAL CONDITIONS

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: August 25, 2006

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
PM	particulate matter
PM₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060020

Permittee: Plum Creek Northwest Lumber, Inc.	Facility ID No. 001-00091	Date Issued: August 25, 2006
Location: Meridian, Idaho		

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This permit to construct is for the installation of a new cyclone and to remove the hours of operation limit.
- 1.2 This revised permit replaces Tier II Permit No. 001-00091, issued July 12, 2002, the terms and conditions of which shall no longer apply.

Regulated Sources

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

Table 1.1 REGULATED EMISSIONS SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Cut Plant	2 Cyclones (existing)
4	Edge Glue operation	Baghouse (2002) and Cyclone (new)

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Location:	Meridian, Idaho				

2. FACILITY-WIDE CONDITIONS

2.1 Process Description

The provisions of this section are facility-wide conditions and generally apply to the entire facility.

Emissions Limits

2.2 Visible Emissions

Visible emissions from any point of emissions 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.

Operating Requirements

2.3 Fugitive Emissions Requirements

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and activities and atmospheric conditions that might affect the movement of PM. 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.

2.4 Open Burning Rules

The permittee shall comply with the provisions of IDAPA 58.01.01.600-616 to protect public health and welfare from air pollutants resulting from open burning.

2.5 Air Pollution Emergency Rule

The permittee shall comply with the *Air Pollution Emergency Rule* in IDAPA 58.01.01.550-562.

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2.6 Excess Emissions Requirements

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

Monitoring and Recordkeeping Requirements

2.7 Visible Emissions Monitoring and Recordkeeping

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. A compilation of the most recent two years of data shall be kept on site and shall be made available to DEQ representatives upon request.

2.8 Fugitive Emissions Monitoring and Recordkeeping

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 emission 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. A compilation of the most recent two years of data shall be kept on site and shall be made available to DEQ representatives upon request.

2.9 Fugitive Dust Complaint Monitoring and Recordkeeping

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. A compilation of the most recent two years of data shall be kept on site and shall be made available to DEQ representatives upon request.

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Location:	Meridian, Idaho			

Reporting Requirements

2.10 Excess Emissions Reporting

Excess emissions reports and notifications required in IDAPA 58.01.01.130-136 shall be sent to the following:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, ID 83706-2239

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Permittee: Plum Creek Northwest Lumber, Inc.	Facility ID No. 001-00091	Date Issued: August 25, 2006
Location: Meridian, Idaho		

3. EMISSIONS UNIT NO. 1 – CUT PLANT

3.1 Process Description

The primary purpose of the cut plant is to cut specified sizes of shelving and lumber from primary mill grade lumber. The process is limited to grading, ripping, trimming, and planing the lumber. Wood waste from the cut plant is pneumatically transferred to two cyclones, which separate fine material from larger, heavier material. The separated larger material is dropped from cyclones to two enclosed, back-to-back truck load-out storage bins. The wood waste material is later loaded into trucks and hauled offsite as product.

3.2 Emissions Control Description

Cut plant processes are performed in a building enclosure. Emissions from the cut plant processes are controlled by the building enclosure. The resulting wood waste (sawdust, shavings and chips) is processed by the two cyclones as described in Permit Condition 3.1. Fine material processed by the cyclones is vented to the atmosphere.

Table 3.1 CUT PLANT PROCESSES EMISSIONS CONTROL DEVICE AND EMISSIONS POINT

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Cut Plant	Building enclosure	2 Cyclones (existing)

Emissions Limits

- 3.3 The permittee shall comply with the visible emission requirements of Permit Condition 2.2.
- 3.4 Emissions of PM from cut plant processes shall comply with process weight limits in accordance with the provisions of IDAPA 58.01.01.700-703.

Operating Requirements

3.5 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an operations and maintenance manual for the cut plant cyclones, which describes the procedures that will be followed to comply with General Provision 2 and the manufacturer's specifications. The manual shall include, at a minimum, a general description of the cyclones; normal operating conditions and procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; and provisions for annual inspections. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request. Once developed, a draft copy of the manual shall be submitted for review to DEQ's Boise Regional Office at the following address:

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Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706

Monitoring and Recordkeeping Requirements

3.6 Visible Emissions Monitoring

The permittee shall monitor and record visible emissions from cut plant operations in accordance with Permit Condition 2.7.

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Location: Meridian, Idaho		

4. EMISSIONS UNIT NO. 2 – EDGE GLUE OPERATIONS

4.1 Process Description

The primary purpose of the edge glue operations is to produce panels from grade cuts of lumber that do not meet product specifications. The process includes ripping, chopping, molding, gluing, planing and sanding wood pieces. Wood waste (sawdust, shavings and chips) from the edge glue operations is received by a baghouse and new 20,000 cfm cyclone when it is pneumatically transferred to a truck load-out storage bin. The wood waste material is later loaded into trucks and hauled offsite as product.

4.2 Emissions Control Description

Emissions from the edge glue operations are controlled by building enclosure(s). All wood waste (sawdust, shavings and chips) generated from edge glue operations is processed by a baghouse and the new cyclone.

Table 4.1 EDGE GLUE OPERATIONS EMISSIONS CONTROL DEVICE AND EMISSIONS POINT

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Edge Glue Operations	Building enclosure	Baghouse (2002) and Cyclone (new)

Emissions Limits

- 4.3 The permittee shall comply with the visible emission requirements of Permit Condition 2.2.
- 4.4 Emissions of PM from cut plant processes shall comply with process weight limits in accordance with the provisions of IDAPA 58.01.01.700-703.

Operating Requirements

4.5 Pressure Drop Monitoring Device

- The permittee shall install, calibrate, maintain, and operate a pressure drop monitoring device to continuously measure the pressure differential across the baghouse.
- The pressure drop across the baghouse shall remain within manufacturer specifications and recommendations. This pressure drop range shall be made available to DEQ representatives upon request.

4.6 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an operations and maintenance manual for the edge glue cyclone and baghouse, which describes the procedures that will be followed to comply with General Provision 2 and the manufacturer’s specifications. The manual shall include, at a minimum, a general description of the cyclones; normal operating conditions and procedures; methods of preventing

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malfunctions; appropriate corrective actions to be taken; and provisions for annual inspections. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request. Once developed, a draft copy of the manual shall be submitted for review to DEQ's Boise Regional Office at the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706

Monitoring and Recordkeeping Requirements

4.7 Pressure Drop Monitoring and Recordkeeping

The permittee shall monitor and record the pressure drop across the baghouse once per week while the baghouse is operating. The information shall be maintained and shall be made available to DEQ representatives upon request.

4.8 Visible Emissions Monitoring

The permittee shall monitor and record visible emissions from edge glue operations in accordance with Permit Condition 2.7.

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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 furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
 - A notification of the date of initiation of construction, within five working days after occurrence;
 - A notification of the date of completion/cessation of construction, within five working days after occurrence;
 - 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;
 - A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
 - A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - 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.

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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 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.

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.