



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Permit to Construct No. P-2007.0231

FINAL

QB Corporation

Salmon, Idaho

Facility ID No. 059-00008

September 17, 2008

Almer Casile

Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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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
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
gr	grain (1 lb = 7,000 grains)
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
gpm	gallons per minute
HAP	Hazardous Air Pollutant
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
MMBtu	million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO_2	sulfur dioxide
SO_x	sulfur oxides
TAP	Toxic Air Pollutant
T2	Tier II operating permit
T2/PTC	Tier II operating permit and permit to construct
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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1. FACILITY INFORMATION

1.1 Facility Description

The facility produces laminated beams, trusses, and arches from dimensional lumber.

1.2 Permitting Action and Facility Permitting History

Permit to Construct

This PTC is for a minor modification at an existing minor facility. The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

August 12, 1998

PTC No. 059-00008, Construction Of A Wood-Fired Boiler,
Permit Status (A)

2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

2.1 Application Scope

The proposed permitting action involves the modification of the existing permit to include emissions from cyclones, a target box, and a lumber drying kiln.

2.2 Application Chronology

December 12, 2007	DEQ received application and application fee.
January 2, 2008	DEQ determined application incomplete.
February 8, 2008	DEQ received additional information.
February 12, 2008	DEQ received additional information.
February 13, 2008	DEQ received additional information.
February 21, 2008	DEQ received additional information.
April 21, 2008	DEQ received additional information.
May 9, 2008	DEQ determined application complete.
September 15, 2008	DEQ received permit processing fee.

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3. TECHNICAL ANALYSIS

3.1 Emission Unit and Control Device

Table 3.1 EMISSION UNIT AND CONTROL DEVICE INFORMATION

Emissions Unit	Control Device Description	Emissions Discharge Point ID No. and/or Description
Wood-Fired Boiler 12.3MMBtu/hr heat input capacity	12-tube Zurn Multi-Tube Collector	Stack
Drying Kiln	None	Drying Kiln Vents
Target Box	None	Vent
Cyclone 1	None	Cyclone 1 Stack
Cyclone 2	None	Cyclone 2 Stack
Cyclone 3	None	Cyclone 3 Stack
Cyclone 4	None	Cyclone 4 Stack
Cyclone 5	None	Cyclone 5 Stack
Cyclone 6	None	Cyclone 6 Stack
Cyclone 7	None	Cyclone 7 Stack
Cyclone 9	None	Cyclone 9 Stack
Cyclone 10	None	Cyclone 10 Stack

3.2 Emissions Inventory

The following emission inventory was based on a heat input of 12.3 MMBtu/hr and 75,000 MMBtu/yr

Table 3.3 CONTROLLED EMISSIONS ESTIMATES OF CRITERIA POLLUTANTS

Emissions Unit	PM ₁₀		SO ₂		NO _x		CO		VOC		LEAD
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/quarter
Point Sources Affected by this Permitting Action											
Boiler	3.53	15.46	0.31	1.35	2.71	11.85	7.38	32.32	0.21	0.91	6.47E-04
Cyclone 1	1.84	3.83									
Cyclone 2	1.99	4.13									
Cyclone 3	2.14	4.51									
Cyclone 4	0.74	0.15									
Cyclone 5	0.74	0.15									
Cyclone 6	1.53	1.53									
Cyclone 7	0.36	4.00E-03									
Cyclone 9	3.35	6.96									
Cyclone 10	7.82	7.82									
Process Fugitive/Volume Sources Affected by this Permitting Action											
Drying Kiln	0.0434	0.19							0.3425	1.50	
Target Box	2.50E-03	2.60E-03									

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Table 3.5 CONTROLLED TAP AND HAP EMISSIONS SUMMARY

TAPs	HAPs	EL	24-hour Average ^a	Annual Average ^a
		lb/hr	lb/hr	lb/hr
Boiler				
Acrolein		0.017	4.920E-02	N/A
Hydrogen Chloride		0.05	2.337E-01	N/A
Silver		0.001	2.091E-02	N/A
Acetaldehyde	Y	3.00E-03	N/A	7.106E-03
Arsenic (controlled)		1.50E-06	N/A	1.010E-04
Benzene	Y	8.00E-04	N/A	3.596E-02
Benzo(a)pyrene		2.00E-06	N/A	2.226E-05
Cadmium		3.70E-06	N/A	3.510E-05
Carbon Tetrachloride	Y	4.40E-04	N/A	3.853E-04
Chloroform	Y	2.80E-04	N/A	2.397E-04
Chromium, Hexavalent		5.60E-04	N/A	2.997E-05
1,2-Dichloroethane		2.50E-04	N/A	2.483E-04
Dioxins and Furans	Y	2.20E-08	N/A	3.857E-10
Formaldehyde	Y	1.50E-10	N/A	3.767E-02
Nickel		2.70E-05	N/A	2.825E-04
Polyaromatic Hydrocarbons		2.00E-06	N/A	2.513E-05
Kiln				
Acrolein		0.017	3.219E-04	
Methanol		17.3	1.607E-02	
Propionaldehyde		0.0287	9.100E-04	
Acetaldehyde	Y	3.00E-03		8.160E-02
Formaldehyde	Y	1.50E-10		2.388E-03

a. 24-hour average only applies to non-carcinogenic TAPs. Annual average only applies to carcinogenic TAPs.

b. NA = not applicable.

Total HAPS emissions equal 0.16 T/yr.

3.3 Ambient Air Quality Impact Analysis

The facility has demonstrated compliance to DEQ's satisfaction that emissions from this facility will not cause or significantly contribute to a violation of any ambient air quality standard. The ambient air quality impact analysis was based on Missoula, MT and Lewiston, Idaho meteorological data. TAP emissions screening level analysis is summarized in Table 3.5. The subsequent modeled concentrations for those pollutants exceeding the screening level is summarized in Table 3.7.

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Pollutant	Averaging Period	Contribution ($\mu\text{g}/\text{m}^3$)	Significant Contribution Limit ($\mu\text{g}/\text{m}^3$)	Percent of NAAQS
PM10	24-hour	75.89	5	1518%
	Annual	20.07	1	2007%
NO2	Annual	4.82	1	482%
SO2	3-hr	7.40	25	30%
	24-hr	2.64	5	53%
	Annual	0.55	1	55%
CO	1-hour	228.99	2000	11%
	8-hour	103.50	500	21%

Table 3.6 FULL IMPACT ANALYSIS RESULTS FOR CRITERIA POLLUTANTS

Pollutant	Averaging Period	Facility Ambient Impact ($\mu\text{g}/\text{m}^3$)	Background Concentration ($\mu\text{g}/\text{m}^3$)	Total Ambient Concentration ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)	Percent of NAAQS
PM ₁₀	Annual	20.07	26	46.1	50	92
	24-hour	69.52	73	142.5	150	95
NO ₂	Annual	4.82	4.3	9.1	100	9
Pb	Quarterly	0.0041	0.03	0.034	1.5	2

NA: The emissions rate is below the modeling threshold; modeling is not required in accordance with State of Idaho Air Quality Modeling Guidance DEQ Publication, December 2002, or alternative threshold approved by DEQ Modeling Coordinator.

Table 3.7 FULL IMPACT ANALYSIS RESULTS FOR TAPS

Pollutant	Average Period	Concentration ($\mu\text{g}/\text{m}^3$)	Regulatory AAC/AACC ($\mu\text{g}/\text{m}^3$)	Percent of Limit
Acrolein	24-hour	0.43	12.50	3.43
Hydrogen Chloride	24-hour	2.01	375	0.54
Silver	24-hour	0.18	5	3.60
Acetaldehyde	Annual	0.20	4.50E-01	44.18
Arsenic (controlled)	Annual	1.80E-04	2.30E-04	78.26
Benzene	Annual	6.41E-02	1.20E-01	53.38
Benzo(a)pyrene	Annual	3.97E-05	3.00E-04	13.22
Cadmium	Annual	6.25E-05	5.60E-04	11.17
Carbon Tetrachloride	Annual	6.86E-04	6.70E-02	1.02
Chloroform	Annual	4.27E-04	4.30E-02	0.99
Chromium, Hexavalent	Annual	5.34E-05	8.30E-05	64.31
1,2-Dichloroethane	Annual	4.42E-04	3.80E-02	1.16
Dioxins and Furans	Annual		2.20E-08	
Formaldehyde	Annual	6.93E-02	7.70E-02	89.96
Nickel	Annual	5.03E-04	4.20E-03	11.98
Polyaromatic Hydrocarbons	Annual	4.48E-05	3.00E-04	14.92

Note: AACs are in units of milligrams per meter cubed whereas AACCs are in units of micrograms per meter cubed. In this table, AACs have been converted from milligrams per meter cubed to micrograms per meter cubed.

4. REGULATORY REVIEW

4.1 Attainment Designation (40 CFR 81.313)

The facility is located in Lemhi County which is designated as attainment or unclassifiable for PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone. Reference 40 CFR 81.313.

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4.2 Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The facility's proposed project does not meet the permit to construct exemption criteria contained in Sections 220 through 223 of the Rules. Therefore, a PTC is required

4.3 Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 Tier II Operating Permit.

The facility has not requested a Tier II operating permit, nor is a Tier II operating permit required to be issued to the facility.

4.4 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.312..... Duty To Apply

The facility is not a Tier I source in accordance with IDAPA 58.01.01.006.113. Therefore, the requirements of IDAPA 58.01.01.312 do not apply.

4.5 PSD Classification (40 CFR 52.21)

40 CFR 52.21..... Prevention of Significant Deterioration Of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source, not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52.21(b). Therefore, in accordance with 40 CFR 52.21(a)(2), the PSD requirements do not apply.

4.6 NSPS Applicability (40 CFR 60)

40 CFR 60, Subpart Dc..... National Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

40 CFR 60.40c..... Applicability and Delegation of Authority.

In accordance with 40 CFR 60.40c(a), the permittee's boiler is an affected facility because it is a steam generating unit with a rated capacity of 12.3 MMBtu/hr that commenced modification after June 9, 1989. 40 CFR 60.40c(b) does not apply to the facility. 40 CFR 60.40c(c) applies to the boiler because it meets the applicability requirements 40 CFR 60.40c(a). 40 CFR 60.40c(d) is an informational section. 40 CFR 60.40c(e) does not apply because the boiler is not a heat recovery steam generator. 40 CFR 60.40c(f) and (g) are informational.

40 CFR 60.41c..... Definitions.

The definitions of this section apply to the facility.

40 CFR 60.42c..... Standard for Sulfur Dioxide.

40 CFR 60.42c(a) does not apply because the boiler does not combust coal. 40 CFR 60.42c(b), (b)(1), (b)(1)(i)-(ii), (b)(2), (b)(2)(i)-(ii) do not apply because the boiler combusts neither coal, nor coal with any other fuel. 40 CFR 60.42c(c) and (c)(1) through (4) do not apply because the boiler does not combust coal, alone or in combination with any other fuel.

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40 CFR 60.42c(d) does not apply because the boiler does not combust oil. 40 CFR 60.42c(e) does not apply because the boiler does not combust coal, oil, or coal and oil with any other fuel. 40 CFR 60.42c(f), (f)(1), and (f)(2) do not apply because the permittee is not reducing SO₂ emissions through fuel pretreatment and because it has chosen to comply with the percent sulfur content limitation of 40 CFR 60.42c(d). 40 CFR 60.42c(g) does not apply because the permittee does not combust oil. 40 CFR 60.42c(h), (h)(1) through (3) and (i) do not apply because the permittee does not combust oil or coal. 40 CFR 60.42c(j) is informational.

40 CFR 60.43c..... Standard for Particulate Matter.

40 CFR 60.43c(a), (a)(1), and (a)(2) do not apply because the boiler does not combust coal or mixtures of coal with other fuels, and does not have a heat input capacity greater than 30MMBtu/hr. 40 CFR 60.43c(b), (b)(1), and (b)(2) do not apply because the boiler does not have a heat input capacity greater than 30MMBtu/hr. The opacity requirement 40 CFR 60.43c(c) does not apply because the boiler does not have a heat input capacity greater than 30MMBtu/hr. 40 CFR 60.43c(d) does not apply because the opacity requirement of 40 CFR 60.43c(c) does not apply. 40 CFR 60.43c(e), e(1), (e)(2), (e)(2)(i) and (ii), (e)(3), and (e)(4) do not apply because the boiler has a heat input capacity less 8.7 MW (30 million Btu/hr).

40 CFR 60.44c..... Compliance and Performance Test Methods and Procedures for Sulfur Dioxide.

The requirements of 40 CFR 60.44c(a) through (j) do not apply because the requirements of 60 CFR 42c do not apply and the permittee does not combust coal, oil, or coal and oil with any other fuel.

40 CFR 60.45c..... Compliance and Performance Test Methods and Procedures for Particulate Matter.

The requirements of 40 CFR 60.45c do not apply because the requirements of 40 CFR 60.43c do not apply.

40 CFR 60.46c..... Emission Monitoring for Sulfur Dioxide.

The requirements of 40 CFR 60.46c do not apply because the requirements of 40 CFR 60.42c do not apply.

40 CFR 60.47c..... Emission Monitoring for Sulfur Dioxide.

The requirements to install, calibrate, maintain, and operate a COMS for measuring the opacity of the emissions discharged to the atmosphere and record the output of the system of 40 CFR 60.47c(a) do not apply because the particulate matter requirements of 40 CFR 60.43c do not apply. The requirements of 40 CFR 60.47c(b) do not apply because the facility does not operate of COMS. The requirement of 40 CFR 60.47c(c) do not apply because the facility does not combust distillate oil.

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40 CFR 60.48c..... Reporting and Recordkeeping Requirements.

40 CFR 60.48c(a), and (a)(1) apply to the boiler. 40 CFR 60.48c(a)(2) through(4) do not apply because the facility does not have any federally enforceable limits on annual capacity, nor has the facility requested to use an emerging technology to control SO₂ emissions in accordance with 40 CFR 60.42c, or 60.43c. 40 CFR 60.48c(b) does not apply because the permittee is not subject to the SO₂ emission limits of 40 CFR 42c, the PM or opacity limits of 40 CFR 60.43c, or required to perform tests in accordance with 40 CFR 60.42c or 60.43c. 40 CFR 60.48c(c) does not apply because the opacity requirements 40 CFR 60.43c do not apply. The permittee is not required to report to the Administrator in accordance 40 CFR 60.48c(d) because the permittee is not subject to fuel oil sulfur limits. 40 CFR 60.48c(e) does apply because the facility is subject to fuel oil sulfur limits. 40 CFR 60.48c(3) through (10) do not apply because the facility is not subject to SO₂ emission limits nor does it use a CEMS.

40 CFR 60.48c(f)(1), (2), (3) and (4) do not apply because the boiler does not combust distillate oil, residual oil, or coal.40 CFR 48c(g)(1), (i) and (j) generally apply. 40 CFR 48c(h) does not apply because the permittee is not subject to a limit on annual capacity in accordance with 40 CFR 60.42c or 60.43c. 40 CFR 60.48c(g)(2) and (3) do not apply because the sulfur requirements of 40 CFR 42c do not apply.

4.7 NESHAP Applicability (40 CFR 61)

No NESHAP applies to this facility.

4.8 MACT Applicability (40 CFR 63)

No MACT applies to this facility because it is a minor source of HAPs.

4.9 CAM Applicability (40 CFR 64)

40 CFR 64 does not apply to this facility because it is not required to obtain a part 70 or 71 permit.

4.10 Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Wood-Fired Boiler

Permit Condition 2.3 establishes PM₁₀ emission limits for the wood-fired boiler. A short-term and annual PM₁₀ emission limits have been established in order to assure compliance with the 24-hr and annual NAAQS for PM₁₀. Permit Condition 2.5 establishes the hourly and annual steam output of the wood-fired boiler. Permit Condition 2.5 has been established to assure compliance with Permit Condition 2.3. Permit Condition 2.5 has also been established to limit emissions of TAPs listed in Table 3.7 above, and assure compliance with IDAPA 58.01.01.585 and 585. Permit Conditions 2.8 and 2.10 have establish the monitoring and recordkeeping necessary to demonstrate compliance with 2.5

Permit Condition 2.6 has been established to assure compliance with Permit Condition 2.3. Permit Condition 2.6 establishes the procedures for developing an O&M manual for the wood-fired boiler control device and specifies the content of the O&M manual for the control device. Permit Condition 2.7 contains the requirements regarding the corrective action the facility shall take to bring the operating parameter specified in Permit Condition 2.6 back within the operating range specified therein.

Permit Condition 2.9 establishes the testing requirements that shall be used to demonstrate compliance with Permit Condition 2.3, and determine that the operating conditions specified in the O&M manual required in Permit Condition 2.6 assure compliance with Permit Condition 2.3. Permit Condition 2.9

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also establishes the procedures that the facility shall use to establish new operating requirements in the O&M manual.

Permit Condition 2.4 establishes the opacity requirements for the wood-fired boiler. Permit Conditions 2.6, 2.7, 2.9, and 2.10 shall be used to assure compliance with Permit Condition 2.4.

Drying Kiln

Permit Condition 3.3 establishes PM₁₀ emission limits for the drying kiln. Short-term and annual PM₁₀ emission limits have been established in order to assure compliance with the 24-hr and annual NAAQS for PM₁₀. Permit Condition 3.5 establishes the hourly and annual kiln throughput of the drying kiln. Permit Condition 3.5 has been established to assure compliance with Permit Condition 3.3. Permit Condition 3.5 has also been established to limit emissions of TAPs listed in Table 3.7 of the above, and assure compliance with IDAPA 58.01.01.585 and 585. Permit Condition 3.6 establishes the monitoring and recordkeeping necessary to demonstrate compliance with 3.5

Permit Condition 3.4 establishes the opacity requirements for the drying kiln. Permit Condition 3.7 has been established to assure compliance with Permit Condition 3.4

Cyclones

Permit Condition 4.3 establishes PM₁₀ emission limits for the cyclones listed in Table 4.3. Short-term and annual PM₁₀ emission limits have been established in order to assure compliance with the 24-hr and annual NAAQS for PM₁₀. Permit Condition 4.5 establishes the daily and annual operating limits for the cyclones. These limits have also been established to assure compliance with the 24-hr and annual NAAQS for PM₁₀. Permit Condition 4.6 requires the facility to install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to measure the total motor amperage load of each cyclone listed in Table 4.2 in order to demonstrate compliance with Permit Condition 4.5. (The term "total motor amperage load" has been used because some cyclones have more than one motor, and thus total motor amperage load represents the sum amperage load of all motors for a cyclone.) Permit Condition 4.6 does not state "continuously" because the cyclones operate with fixed load blowers, which by design do not vary load (and thus flowrate). Therefore, one daily reading is adequate to demonstrate compliance with Permit Condition 4.5. Permit Condition 4.7 establishes the requirements for maintaining and operating each cyclone listed in Table 4.2 in order to assure compliance with Permit Condition 4.3. Permit Conditions 4.8 and 4.9 established the monitoring and recordkeeping requirement that the facility shall use to demonstrate compliance with Permit Condition 4.5. Permit Condition 4.10 established the procedure for establishing new total motor amperage load values for each cyclone listed in Table 4.2

5. PERMIT FEES

Table 5.1 lists the processing fee associated with this permitting action. The facility is subject to a processing fee of \$1000 because its increase of emissions is less than one ton per year. Refer to the chronology for application and processing fee receipt dates.

Table 5.1 PROCESSING FEE TABLE

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	2.68	-2.68
SO ₂	0.0	0.31	-0.31

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CO	0.0	7.30	-7.30
PM ₁₀	0.0	8.07	-8.07
VOC	0.0	0.21	-0.21
HAPS	0	0.1	-0.1
Total:	0.0	18.67	-18.67
Fee Due	\$ 1000.00		

6. PUBLIC COMMENT

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An opportunity for public comment period on the PTC application was provided from December 27, 2007 to January 11, 2008 in accordance with IDAPA 58.01.01.209.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ's proposed action.

Appendix A – AIRS Information

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Permittee/Facility Name: QB Corporation
Facility Location: Salmon
AIRS Number: 059-00008

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION
								A-Attainment U-Unclassified N- Nonattainment
SO ₂	B							U
NO _x	B							U
CO	B							U
PM ₁₀	B							U
PT (Particulate)	B							
VOC	B							
THAP (Total HAPs)	B							
			APPLICABLE SUBPART					
			Dc					

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

Appendix B – Emissions Inventory

Because the Acceptable Ambient Concentration for Carcinogenic air pollutants (AACC) are based on the highest annual average concentration, the average hourly emission rates for these pollutants were used in the modeling analysis. The average hourly emission rates were calculated from the 75,000 MMBtu/yr annual input limit of the boiler. For example, acetaldehyde with an emission factor of 8.30E-04 lb/MMBtu at the limited annual boiler input would have an average hourly emissions rate of:

$$\frac{\left(8.30E-04 \frac{\text{lb}}{\text{MMBtu}}\right)\left(75,000 \frac{\text{MMBtu}}{\text{yr}}\right)}{8760 \frac{\text{hr}}{\text{yr}}} = 7.106E-03 \text{ lb/hr}$$

as shown in the table. Because the kiln also

emits acetaldehyde and formaldehyde, the average hourly emission rates were used in the modeling analysis to determine the maximum annual impacts at the limited annual operating rates for the boiler and the kiln.

The dioxin/furan emission factor of 1.760E-11 lb/MMBtu gives a potential emission rate of: 12.3 lb/MMBtu \times 1.760E-11 lb/MMBtu = 2.165 E-10 lb/hr. The average hourly emission rate from the limited annual input of 75,000 MMBtu/yr would be:

$$\frac{\left(1.760E-11 \frac{\text{lb}}{\text{MMBtu}}\right)\left(75,000 \frac{\text{MMBtu}}{\text{yr}}\right)}{8760 \frac{\text{hr}}{\text{yr}}} = 1.5068E-10 \text{ lb/hr}$$

The modeled annual average concentration

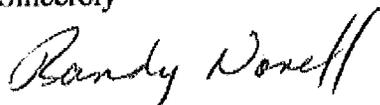
at a 1 lb/hr emission rate using the Missoula meteorological data was 1.78136 $\frac{\mu\text{g}/\text{m}^3}{\text{lb/hr}}$ which

gives an ambient concentration of: 1.78136 $\frac{\mu\text{g}/\text{m}^3}{\text{lb/hr}} \times 1.5086E-10 \text{ lb/hr} = 2.6842E-10 \mu\text{g}/\text{m}^3$.

This is well below the AACC limit of 2.20E-8 $\mu\text{g}/\text{m}^3$. I have included an expanded table which includes dioxin/furan showing the potential and average emission rates for the boiler.

I hope this clarifies the emission rates used for the modeling analysis. Please feel free to call me if you have any further questions.

Sincerely



Randy Norell

Boiler Operating Parameters	
Maximum Input (MMBtu/hr)	12.3
Maximum Output (lb steam/hr)	8,910
Limited Annual Input (MMBtu/yr)	75,000.00
Limited Annual Output (MMlb steam/yr)	54.33

Criteria Pollutants	Emission Factors lb/MMBtu	Potential (lb/hr)	Emission Rate	
			Average Annual (lb/hr)	(tons/yr)
PM10	0.287	3.5301	NA	10.763
SO2	0.025	0.3075		0.938
NOx	0.22	2.7060		8.250
CO	0.6	7.3800		22.500
VOC	0.017	0.2091		0.638
Lead	4.80E-05	5.904E-04		1.800E-03

Toxic Air Pollutants	Emission Factors lb/MMBtu	Potential (lb/hr)	Emission Rate	
			Average Annual (lb/hr)	(tons/yr)
Non-Carcinogenic				
Acrolein	4.00E-03	4.920E-02	NA	1.50E-01
Hydrogen Chloride	1.90E-02	2.337E-01		7.13E-01
Silver	1.70E-03	2.091E-02		6.38E-02
Carcinogenic*				
Acetaldehyde	8.30E-04	1.021E-02	7.106E-03	3.11E-02
Arsenic (controlled)	1.18E-05	1.452E-04	1.010E-04	4.43E-04
Benzene	4.20E-03	5.166E-02	3.596E-02	1.58E-01
Benzo(a)pyrene	2.60E-06	3.198E-05	2.226E-05	9.75E-05
Cadmium	4.10E-06	5.043E-05	3.510E-05	1.54E-04
Carbon Tetrachloride	4.50E-05	5.535E-04	3.853E-04	1.69E-03
Chloroform	2.80E-05	3.444E-04	2.397E-04	1.05E-03
Chromium, Hexavalent	3.50E-06	4.305E-05	2.997E-05	1.31E-04
1,2-Dichloroethane	2.90E-05	3.567E-04	2.483E-04	1.09E-03
Dioxins and Furans	1.76E-11	2.165E-10	1.507E-10	6.60E-10
Formaldehyde	4.40E-03	5.412E-02	3.767E-02	1.65E-01
Nickel	3.30E-05	4.059E-04	2.825E-04	1.24E-03
Polycyclic Aromatic Hydrocarbons	2.94E-06	3.610E-05	2.513E-05	1.10E-04

Toxic Air Pollutant Ambient Assessment

Averaging Period	Modeled Impact ($\mu\text{g}/\text{m}^3$)
Modeled 24-hr Concentration at 1 lb/hr ($\mu\text{g}/\text{m}^3$)	8.61044
Modeled Annual Concentration at 1 lb/hr ($\mu\text{g}/\text{m}^3$)	1.78136

Toxic Air Pollutants	Averaging Period	Boiler Emission Rate (lb/hr)	Concentration ($\mu\text{g}/\text{m}^3$)	Limit ($\mu\text{g}/\text{m}^3$)	Percent of Limit
Acrolein*	24-hour	4.920E-02	0.42872	12.50	3.43%
Hydrogen Chloride		2.337E-01	2.0123	375	0.54%
Silver		2.091E-02	0.1800	5	3.60%
Acetaldehyde*	Annual	7.106E-03	0.19883	4.50E-01	44.18%
Arsenic		1.010E-04	1.80E-04	2.30E-04	78.25%
Benzene		3.596E-02	6.41E-02	1.20E-01	53.38%
Benzo(a)pyrene		2.226E-05	3.97E-05	3.00E-04	13.22%
Cadmium		3.510E-05	6.25E-05	5.60E-04	11.17%
Carbon Tetrachloride		3.853E-04	6.86E-04	6.70E-02	1.02%
Chloroform		2.397E-04	4.27E-04	4.30E-02	0.99%
Chromium, Hexavalent		2.997E-05	5.34E-05	8.30E-05	64.31%
1,2-Dichloroethane		2.483E-04	4.42E-04	3.80E-02	1.16%
Dioxins and Furans		1.507E-10	2.68E-10	2.20E-08	1.22%
Formaldehyde*		3.767E-02	0.06927	7.70E-02	89.96%
Nickel		2.825E-04	5.03E-04	4.20E-03	11.98%
Polyaromatic Hydrocarbons		2.513E-05	4.48E-05	3.00E-04	14.92%

* Acrolein, Acetaldehyde and Formaldehyde modeled at actual emission rates for both the boiler and lumber drying kiln. Other toxic air pollutants emitted by the boiler only and modeled at a 1 lb/hr emission rate.

Wood waste from the sanding, planing and trimming operations are pneumatically transferred through the cyclones and the target box to their respective bins. Emission rates for the cyclone target box were calculated using emission factors from the "Idaho DEQ Emission Factor Guide Wood Industry" Attachment B. Cyclones emissions are calculated from the grain loading emission factors for medium and high efficiency cyclones. The potential throughput for the target box of lb/hr is estimated from an airflow of 1,540 scf/min. Emission estimates for the Cyclones and target box are summarized in the table below. An example calculation is also included.

Cyclone and Target Box Emissions						
Source	Emission Factors					
	PM	PM10	Units			
Medium Efficiency Cyclones (1 - 7)	0.03	0.015	grains/scf			
High Efficiency Cyclones (9 and 10)	0.0150	0.011	grains/scf			
Target Box (Medium Efficiency)	0.1000	0.05	lb/BDT			
Cyclone #	Exhaust Flow (acfm)	Operating (hr/yr)	PM		PM10	
			(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)
1	14,320	4160	3.682	7.659	1.841	3.830
2	15,463	4160	3.976	8.270	1.988	4.135
3	16,875	4160	4.339	9.026	2.170	4.513
4	5,741	420	1.476	0.310	0.738	0.155
5	5,741	420	1.476	0.310	0.738	0.155
6	5,741	4160	1.476	3.071	0.738	1.535
7	2,812	20	0.723	0.007	0.362	0.004
9	35,500	4160	4.564	9.494	3.347	6.962
10	39,900	4160	5.130	10.670	3.762	7.825
	Throughput (tons/hr)	Operating (hr/yr)	PM		PM10	
			(lb/hr)	(tons/yr)	(lb/hr)	(tons/yr)
Target Box	0.05	2080	0.0050	0.0052	0.0025	0.0026
Total			26.849	48.823	15.686	29.116

$$\text{Cyclone \#1 PM - 10 Emission Rate} = \frac{(14,320 \text{ scf / min})(0.015 \text{ grains / scf})(60 \text{ min / hr})}{7,000 \text{ gr / scf}} = 1.18411 \text{ lb PM - 10 / hr}$$

4.3 Lumber Drying Kiln Emissions

The lumber drying kiln has a capacity of 30,000 board feet and is used to finish drying lumber that is too moist for processing. Emission estimates were calculated using a limited annual throughput of 2 million board feet per year. Emission factors for the criteria air pollutants are from the "Idaho DEQ Emission Factor Guide for Wood Industry", Attachment B. Toxic air pollutants were estimated from emission factors developed by Oregon State University using the average for all wood species and a kiln temperature of less than 200° F.

Annual Throughput (Brdft)		2,000,000	
Average Hourly Throughput (Brdft)		228.31	
Criteria Pollutants	Emission Factors lb/MBrdft	Potential Emission Rate	
		(lb/hr)	(tons/yr)
PM	0.33	0.0753	0.330
PM-10	0.19	0.0434	0.190
VOC	1.5	0.3425	1.500
Toxic Pollutants Non-Carcinogenic	Emission Factors lb/MMBrdft	Potential Emission Rate	
		(lb/hr)	(tons/yr)
Acrolein	1.410	3.219E-04	1.410E-03
Methanol	70.400	1.607E-02	7.040E-02
Carcinogenic			
Propionaldehyde	0.910	2.078E-04	9.100E-04
Acetaldehyde	81.600	1.863E-02	8.160E-02
Formaldehyde	2.388	5.452E-04	2.388E-03

Emission factors and inventories for the sources are included in Appendix B.

**Appendix C – Ambient Air Quality Impact Analysis
(Reserved)**

Appendix D – Facility Comments

RECEIVED

JUL 28 2008

Department of Environmental Quality
State Air Program

RockieW

From: "RockieW" <qbrock@qbcorp.com>
To: <almer.casile@deq.idaho.gov>
Sent: Monday, July 21, 2008 12:25 PM
Attach: QB CORPORATION - P-2007.0231 Facility Draft Permit for QB Corp.DOC
Subject: Permit p-2007.0231

Dear Mr. Casile,

Please find the attached revision for our PTC application.
If this is acceptable please inform me and I will forward a hard copy to you. Thanks for your help.

Rockie Walker



Maintenance Supervisor
QB Corporation

7/23/08



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

PERMIT No.: P-2007.0231
FACILITY ID No.: 059-00008
AQCR: 063 **CLASS:** B
SIC: 2439 **ZONE:** 12
UTM COORDINATE (km): 290.2, 4989,4

1. PERMITTEE

QB Corporation

2. PROJECT

PTC Modification, Installation Of Cyclones And Target Box, And Changes To The Existing Wood-Fired Boiler

3. MAILING ADDRESS

1420 Hwy 28

CITY

Salmon

STATE

ID

ZIP

83467

4. FACILITY CONTACT

Rockie L. Walker

TITLE

Maintenance Supervisor Purchasing

TELEPHONE

(208) 756-2612

5. RESPONSIBLE OFFICIAL

Rockie L. Walker

TITLE

Maintenance Supervisor Purchasing

TELEPHONE

(208) 756-2612

6. EXACT PLANT LOCATION

Mile marker 121 on State Highway 28

COUNTY

Lemhi

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Produces laminated beams, trusses, and arches from dimensional lumber

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 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 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.

ALMER CASILE, PERMIT WRITER
 DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:

DATE ISSUED:

August 12, 1998

MIKE SIMON, STATIONARY SOURCE PROGRAM
 MANAGER
 DEPARTMENT OF ENVIRONMENTAL QUALITY

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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
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Brdft	Board Feet
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
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
hp	horsepower
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
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMlbs/yr	million pounds per year
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee:	QB Corporation	Facility ID No. 059-00008
Location:	Salmon, Idaho	

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This permitting action involves the modification of the existing permit to include emissions from the facility's drying kiln, cyclones and target box, and changes to the existing wood-fired boiler.
- 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. 059-00008, issued on August 12, 1998, 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	Wood-Fired Boiler	12-tube Zurn Multi-Tube Collector
3	Drying Kiln	None
4	Cyclones & Target Box	None

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee:	QB Corporation	Facility ID No. 059-00008
Location:	Salmon, Idaho	

2. WOOD FIRED BOILER

2.1 Process Description

The wood-fired boiler provides space heat for the facility and heat for the drying kiln

2.2 Emissions Control Description

Table 2.1 [EMISSIONS UNIT NAME] DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Wood-Fired Boiler	12-tube Zurn Multi-Tube Collector	Stack

Emissions Limits

2.3 Emissions Limits

The PM₁₀ emissions from the wood-fire boiler stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 WOOD-FIRED BOILER EMISSIONS LIMITS¹

Source Description	PM₁₀²	
	lb/hr³	T/yr^{3,4}
Wood-Fired Boiler	3.53	10.76

- 1) In absence of any other creditable evidence, compliance is assured by complying with this permit's operating, monitoring and record keeping requirements.
- 2) Particulate matter with and aerodynamic diameter less than or equal to a nominal ten (10) micrometers including condensable particulate as defined in IDAPA 58.01.01.006.81.
- 3) As determined by source test methods prescribed by IDAPA 58.01.01.157.
- 4) Tons per consecutive 12-calendar month period.

[DRAFT]

2.4 Opacity Limit

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

Operating Requirements

2.5 Steam Output Limit

The wood-fired boiler shall not exceed any of the following:

- an annual output of 54.33 MMlbs/yr of steam;
- an hourly output of 8,910 lbs/hr of steam.

[DRAFT]

2.6 Operations and Maintenance (O&M) Manual Requirements

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee:	QB Corporation
Location:	Salmon, Idaho

Facility ID No. 059-00008

The permittee shall maintain an O&M manual for the appropriate emissions control device for the boiler.

- After the initial O&M manual development, the permittee shall update the control device monitoring program in the O&M manuals as necessary after each DEQ-approved performance test.
- The O&M manuals shall address the operation, maintenance, and repair of applicable control device(s) for each source to ensure good working order and operation as efficiently as practicable. The manuals shall include, at a minimum, a general description of the control device(s); normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective action procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; and provisions for annual inspections during planned maintenance outages.
- The O&M manuals shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges where applicable, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, any specific control device monitoring parameter(s) required under any permit condition in this permit, unless DEQ approves their removal from this permit condition. The control device monitoring program shall be developed by the permittee based on performance test results, vendor data, and/or other supporting documentation.

[DRAFT]

2.7 Corrective Action

Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards, unless DEQ determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required.

[DRAFT]

Monitoring and Recordkeeping Requirements

2.8 Monitoring Steam Output

The permittee shall monitor and record the hourly and annual steam output of the boiler to demonstrate compliance with Permit Condition 2.3. Records of this information shall be maintained on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

[DRAFT]

2.9 Performance Test

Within one hundred eighty (180) days of the notification required by General Provision 5 of the initial date of achieving the maximum production rate, a compliance test shall be conducted to demonstrate compliance with Permit Condition 2.3. Testing shall be conducted in accordance with IDAPA 58.01.01.157, and the following:

- Prior to conducting the test, the permittee shall address the required averaging period specified in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee: QB Corporation	Facility ID No. 059-00008
Location: Salmon, Idaho	

- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the steam production rate of the boiler, fuel feed rate in tons per hour, and pressure drop across the multiclone during each test.
- For the fuel used during the source test, the permittee shall record the fuel's highest heating value and fuel's analysis result, including ash content.
- If the PM measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 2.3, no further testing shall be required during this term of the permit. If the PM measured during the initial compliance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 2.3, a second test shall be required in the third year of the permit term. If the PM measured during the initial compliance test is greater than 90% of the emission standard in Permit Condition 2.3, the permittee shall conduct a compliance test annually.
- The permittee may establish new operating parameters by conducting a performance test that demonstrates compliance with Permit Condition 2.3 while operating at the alternative operating parameters. The performance test shall be conducted in accordance with the Test Methods and Procedures specified in the Rules (IDAPA 58.01.01.157) and in accordance with a DEQ-approved source test protocol. All operating parameters specified in this permit condition shall be continuously monitored and recorded during each test run. The permittee may request to operate outside of the operating ranges specified by the manufacturer during the performance test by submitting a written source protocol to DEQ for approval and requesting to operate under alternative operating parameters during the duration of the test. The protocol shall describe how the operating parameters will be monitored during the performance test. Once the source test is completed, the permittee may request in writing to operate in accordance with alternative operating parameters. The request shall include a source test report and justification for the alternative operating parameters. Upon receiving DEQ written approval of the source test and the requested alternative operating parameters, the permittee shall operate in accordance with those DEQ-approved alternative operating parameters. A copy of DEQ's approval shall be maintained on site with a copy of this permit.

[DRAFT]

2.10 Retention of O&M Manual

The O&M manual shall be maintained onsite and shall be made available to DEQ representatives upon request.

Reporting Requirements

2.11 40 CFR 60, Subpart Dc –Record and Maintain Records Of Fuels Combusted

In accordance with 40 CFR 60.48c(g)(2), the permittee shall record and maintain records of the amounts of each fuel combusted during each calendar month.

[DRAFT]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee: QB Corporation

Location: Salmon, Idaho

Facility ID No. 059-00008

2.12 40 CFR 60, Subpart Dc – Notification Requirements

In accordance with 40 CFR 60.48c(a), the permittee shall submit notification of the date of construction or reconstruction and actual startup of the Nebraska boiler, as provided by 40 CFR 60.7 of this part. This notification shall include:

- In accordance with 40 CFR 60.48c(a)(1), date of construction or reconstruction:
- In accordance with 40 CFR 60.48c(a), date of anticipated startup:
- In accordance with 40 CFR 60.48c(a), date of actual startup:

[DRAFT]

2.13 40 CFR 60, Subpart Dc –Recordkeeping

In accordance with CFR 60.48c(i), the permittee shall maintain all records required under Permit Condition 2.11 for a period of two years following the date of such record.

[DRAFT]

2.14 40 CFR 60, Subpart Dc –Duration of Reporting Period

In accordance with CFR 60.48c(j), the reporting period for the reports required under Permit Conditions ~~3.8 and 3.9~~ 2.11 is each six-month period. All reports shall be submitted to DEQ and shall be postmarked by the 30th day following the end of the reporting period.

[DRAFT]

2.15 NSPS Subpart A (40 CFR 60) Summary of General Provisions for Affected Facilities

Generally applicable reporting, record keeping and notification requirements of Subpart A of the New Source Performance Standards (NSPS, 40 CFR 60) are included in Table 3.2. These summaries are provided to highlight the notification and record keeping requirements of 40 CFR 60 for affected facilities, and are not intended to be a comprehensive listing of all general provisions requirements that may apply. Should there be a conflict between these summaries and the NSPS, the NSPS shall govern. The permittee is encouraged to read all of 40 CFR 60 Subpart A. The CFRs are available on-line at: <http://www.gpoaccess.gov/cfr/index.html>.

[DRAFT]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee: QB Corporation
Location: Salmon, Idaho

Facility ID No. 059-00008

Table 3.2 NSPS SUBPART A (40 CFR 60) SUMMARY OF GENERAL PROVISIONS FOR AFFECTED FACILITIES

Section	Section Title	Summary of Section Requirements
60.4	Address	<p>All notifications and reports shall be submitted to:</p> <p>Pocatello Regional Office Department of Environmental Quality 444 Hospital Way, Suite 300 Pocatello, ID 83201 Phone: (208) 236-6160</p>
60.7(b),(c)(d) and (f)	Notification and Record Keeping	<ul style="list-style-type: none"> • Notification of commencement of construction postmarked no later than 30 days of such date. • Notification of startup postmarked within 15 days of such date. • Notification of physical or operational change that may increase emissions postmarked 60 days before the change is made. • Maintain records of the occurrence and duration of any: startup, shutdown or malfunction of the affected source; malfunction of air pollution control device; and any period when a continuous monitoring system or monitoring device is inoperative. • For affected units with continuous monitoring device requirements report excess emissions and monitoring system performance semiannually, postmarked by January 30th and July 30th (in the format required by NSPS). • Maintain in a permanent form records suitable for inspection of all measurements, system testing, performance measurements, calibration checks, and adjustments/maintenance performed. Records shall be maintained for a period of two years from the date the record is required to be generated by the applicable regulation. • CEMS record keeping requirements depending on whether data is automatically or manually recorded - 40 CFR 60.7(f).
60.11(a),(b),(c), (d) and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> • Other than opacity standards, where performance tests are required compliance with standards is determined by methods and procedures established by 40 CFR 60.8. • Compliance with NSPS opacity standards shall be determined by Method 9 of Appendix A. The owner or operator may elect to use COM measurements in lieu of Method 9 provided notification is made at least 30 days before the performance test. • At all times, including periods of startup, shutdown, and malfunction to the extent practicable, the operator shall maintain and operate any affected facility and air pollution control equipment consistent with good air pollution control practices. • For the purposes of determining compliance with standards any creditable evidence may be used if the appropriate performance or compliance test procedure has been performed.
60.12	Circumvention	<p>No owner or operator shall build, erect, install or use any article or method, including dilution, to conceal an emission which would otherwise constitute a violation.</p>
60.14	Modification	<ul style="list-style-type: none"> • Physical or operational changes to source types that are regulated by a NSPS which result in an increase in hourly emissions to which a standard applies is considered a modification (unless expressly exempted the NSPS). Modified sources become subject to the NSPS standards • Note that in accordance with IDAPA 58.01.01.201 no owner or operator may commence a modification without first obtaining a permit to construct unless the modification is exempted from the need to obtain a permit in accordance with IDAPA 58.01.01.220-223.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee:	QB Corporation	Facility ID No. 059-00008
Location:	Salmon, Idaho	

3. DRYING KILN

3.1 Process Description

The drying kiln is used to finish drying lumber that is too wet for processing. The drying kiln has a capacity of 30,000 board feet.

3.2 Emissions Control Description

Table 3.1 [EMISSIONS UNIT NAME] DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Drying Kiln	N/A	Drying Kiln Vents

Emissions Limits

3.3 Emissions Limits

The PM₁₀ emissions from the drying kiln shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 LIME KILN EMISSIONS LIMITS

Source Description	PM ₁₀	
	lb/hr	T/yr
Drying Kiln	0.04	0.19

[Draft]

3.4 Opacity Limit

Emissions from the kiln vents, or any other stack, vent, or functionally equivalent opening associated with the kiln, 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.

[Draft]

Operating Requirements

3.5 Kiln Throughput Limits

The kiln throughput shall not exceed the following:

- 2,000,000 Brdft/yr
- 228.31 Brdft/hr

[Draft]

Monitoring and Recordkeeping Requirements

3.6 Kiln Throughput Monitoring

The permittee shall monitor and record the ~~hourly~~ daily throughput, in Brdft/hr, and annual throughput, in Brdft/yr, of the kiln in order to demonstrate compliance with Permit Condition 3.3.

[Draft]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee: QB Corporation

Location: Salmon, Idaho

Facility ID No. 059-00008

3.7 Visible Emissions Monitoring

The permittee shall conduct a monthly inspection of visible emissions from the drying kiln, 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.

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Permittee: QB Corporation
Location: Salmon, Idaho

Facility ID No. 059-00008

4. CYCLONES

4.1 Process Description

Nine cyclones pneumatically transfer wood waste from the sanding, planing, and trimming operations to their respective bins.

4.2 Emissions Control Description

Table 4.1 [EMISSIONS UNIT NAME] DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Cyclone 1	N/A	Cyclone 1 Stack
Cyclone 2	N/A	Cyclone 2 Stack
Cyclone 3	N/A	Cyclone 3 Stack
Cyclone 4	N/A	Cyclone 4 Stack
Cyclone 5	N/A	Cyclone 5 Stack
Cyclone 6	N/A	Cyclone 6 Stack
Cyclone 7	N/A	Cyclone 7 Stack
Cyclone 9	N/A	Cyclone 9 Stack
Cyclone 10	N/A	Cyclone 10 Stack

[Draft]

Emissions Limits

4.3 Emissions Limits

The PM₁₀ emissions from the cyclone stacks shall not exceed any corresponding emissions rate limits listed in Table 4.2.

Table 4.2 CYCLONES EMISSIONS LIMITS

Source Description	PM ₁₀	
	lb/dy hr	T/yr
Cyclone 1	44.16 4.84	3.38
Cyclone 2	47.76 1.99	4.13
Cyclone 3	52.08 2.17	4.51
Cyclone 4	17.76 0.74	0.15
Cyclone 5	17.76 0.74	0.15
Cyclone 6	17.76 0.74	1.53
Cyclone 7	8.64 0.36	0.004
Cyclone 9	80.40 3.35	6.96
Cyclone 10	90.24	7.82

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Permittee: QB Corporation
Location: Salmon, Idaho

Facility ID No. 059-00008

3-76

[Draft]

4.4 Opacity Limit

Emissions from the cyclone stacks, or any other stack, vent, or functionally equivalent opening associated with the cyclones, 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.

[Draft]

Operating Requirements

4.5 Hours of Operation And Flowrate Limitations

The hours of operation of the cyclones shall not exceed any corresponding limits listed in Table 4.3.

Table 4.3 CYCLONES & TARGET BOX EMISSIONS LIMITS

Source Description	Average Daily Exhaust Flow	Hours of Operation
	Acfm	hr/yr
Cyclone 1	14320 ^a	4160
Cyclone 2	15463 ^a	4160
Cyclone 3	16875 ^a	4160
Cyclone 4	5741 ^a	420
Cyclone 5	5741 ^a	420
Cyclone 6	5741 ^a	4160
Cyclone 7	2812	20
Cyclone 9	35500 ^a	4160
Cyclone 10	39900 ^a	4160

^a based on average of 24 consecutive hourly readings.

[Draft]

4.6 Flowrate Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to ~~continuously~~ daily measure the exhaust flowrate of each cyclone listed in Table 4.2.

[Draft]

4.7 O&M Manual

The permittee shall have developed an O&M manual for each cyclone listed in Table 2.2. according to manufacturer specifications and recommendations. This manual shall describe the methods and procedures that will be followed to assure the cyclones are maintained in good working order and operated as efficiently as practical. This manual shall also document the maximum and minimum flowrate, in ACFM, that each cyclone listed in Table 4.2 will used to demonstrate compliance with Permit Condition 4.3. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and

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inspection of the source. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[Draft]

Monitoring and Recordkeeping Requirements

4.8 Flowrate

The permittee shall monitor and record ~~hourly daily~~ exhaust flow, in ACFM, ~~and the average daily exhaust flow, in ACFM, of~~ of each cyclone listed in Table 4.3 in order to demonstrate compliance with Permit Condition 4.5. ~~The average daily exhaust flow shall be determined by summing hourly exhaust flow over the previous consecutive 24-hour period and dividing by 24.~~

[Draft]

4.9 Hours of Operation

The permittee shall monitor and record annual hours of operation of each cyclone listed in Table 4.3 in order to demonstrate compliance with Permit Condition 4.5.

[Draft]

4.10 Performance Test

The permittee may establish new flowrate values for each cyclone listed in Table 4.2 by conducting a performance test that demonstrates compliance with Permit Condition 4.3 while operating at the alternative flowrate parameters. The performance test shall be conducted in accordance with the Test Methods and Procedures specified in the Rules (IDAPA 58.01.01.157), a DEQ-approved source test protocol, and the following:

- Prior to conducting the test, the permittee shall address the required averaging period specified in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.
- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the steam production rate of the boiler, fuel feed rate in tons per hour, and pressure drop across the multiclone during each run of the test.
- For each cyclone tested, the permittee shall monitor and record the average flowrate, in ACFM, of each run of the test.

All operating parameters specified above shall be continuously monitored and recorded during each test run. The permittee may request to operate outside of the operating ranges specified by the manufacturer during the performance test by submitting a written source protocol to DEQ for approval and requesting to operate under alternative operating parameters during the duration of the test. The protocol shall describe how the operating parameters will be monitored during the performance test. Once the source test is completed and then approved by DEQ, the permittee may request in writing to operate in accordance with alternative operating parameters. The request shall include a source test report and justification for the alternative operating parameters. Upon receiving DEQ written approval of the

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

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source test and the requested alternative operating parameters, the permittee shall operate in accordance with those DEQ-approved alternative operating parameters. A copy of DEQ's approval shall be maintained on site with a copy of this permit.

[Draft]

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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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Permittee:	QB Corporation	Facility ID No. 059-00008
Location:	Salmon, Idaho	

- 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]

Excess Emissions

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee:	QB Corporation	Facility ID No. 059-00008
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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)]

RockieW

RECEIVED
AUG 20 2008
Department of Environmental Quality
State Air Program

From: "RockieW" <qbrock@qbcorp.com>
To: <almer.casile@deq.idaho.gov>
Sent: Monday, August 18, 2008 8:45 AM
Attach: QB CORPORATION - P-2007.0231 Facility Draft Permit for QB Corp.DOC
Subject: permit p-059-00008

Good Morning Almer,

Last week Warren Franks from HJ Burns Co. came to our mill and we took acfm readings and corresponding amperage reading for all the material handling fans to their perspective cyclones. Please note that in table 4.3 that cyclone 1 and 2 have more than 1 fan per cyclone. The acfm and the amps are a combined total. Please call with any questions.

Thanks,

Rockie L Walker



QB Corporation



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

PERMIT No.: P-2007.0231
FACILITY ID No.: 059-00008
AQCR: 063 **CLASS:** B
SIC: 2439 **ZONE:** 12
UTM COORDINATE (km): 290.2, 4989,4

1. PERMITTEE
QB Corporation

2. PROJECT
PTC Modification, Installation Of Cyclones And Target Box, And Changes To The Existing Wood-Fired Boiler

3. MAILING ADDRESS 1420 Hwy 28	CITY Salmon	STATE ID	ZIP 83467
--	-----------------------	--------------------	---------------------

4. FACILITY CONTACT Rockie L. Walker	TITLE Maintenance Supervisor Purchasing	TELEPHONE (208) 756-2612
--	---	------------------------------------

5. RESPONSIBLE OFFICIAL Rockie L. Walker	TITLE Maintenance Supervisor Purchasing	TELEPHONE (208) 756-2612
--	---	------------------------------------

6. EXACT PLANT LOCATION Mile marker 121 on State Highway 28	COUNTY Lemhi
---	------------------------

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Produces laminated beams, trusses, and arches from dimensional lumber

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 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 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.

ALMER CASILE, PERMIT WRITER
 DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:	
DATE ISSUED:	August 12, 1998

**MIKE SIMON, STATIONARY SOURCE PROGRAM
MANAGER**
 DEPARTMENT OF ENVIRONMENTAL QUALITY

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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
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Brdft	Board Feet
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
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
hp	horsepower
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
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMlbs/yr	million pounds per year
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee: QB Corporation

Location: Salmon, Idaho

Facility ID No. 059-00008

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This permitting action involves the modification of the existing permit to include emissions from the facility's drying kiln, cyclones and target box, and changes to the existing wood-fired boiler.
- 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. 059-00008, issued on August 12, 1998, 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	Wood-Fired Boiler	12-tube Zurn Multi-Tube Collector
3	Drying Kiln	None
4	Cyclones & Target Box	None

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee:	QB Corporation	Facility ID No. 059-00008
Location:	Salmon, Idaho	

2. WOOD FIRED BOILER

2.1 Process Description

The wood-fired boiler provides space heat for the facility and heat for the drying kiln

2.2 Emissions Control Description

Table 2.1 [EMISSIONS UNIT NAME] DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Wood-Fired Boiler	12-tube Zurn Multi-Tube Collector	Stack

Emissions Limits

2.3 Emissions Limits

The PM₁₀ emissions from the wood-fire boiler stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 WOOD-FIRED BOILER EMISSIONS LIMITS¹

Source Description	PM ₁₀ ²	
	lb/hr ³	T/yr ^{3,4}
Wood-Fired Boiler	3.53	10.76

- 1) In absence of any other creditable evidence, compliance is assured by complying with this permit's operating, monitoring and record keeping requirements.
- 2) Particulate matter with and aerodynamic diameter less than or equal to a nominal ten (10) micrometers including condensible particulate as defined in IDAPA 58.01.01.006.81.
- 3) As determined by source test methods prescribed by IDAPA 58.01.01.157.
- 4) Tons per consecutive 12-calendar month period.

[DRAFT]

2.4 Opacity Limit

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

Operating Requirements

2.5 Steam Output Limit

The wood-fired boiler shall not exceed any of the following:

- an annual output of 54.33 MMlbs/yr of steam;
- an hourly output of 8,910 lbs/hr of steam.

[DRAFT]

2.6 Operations and Maintenance (O&M) Manual Requirements

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0231

Permittee:	QB Corporation	Facility ID No. 059-00008
Location:	Salmon, Idaho	

The permittee shall maintain an O&M manual for the appropriate emissions control device for the boiler.

- After the initial O&M manual development, the permittee shall update the control device monitoring program in the O&M manuals as necessary after each DEQ-approved performance test.
- The O&M manuals shall address the operation, maintenance, and repair of applicable control device(s) for each source to ensure good working order and operation as efficiently as practicable. The manuals shall include, at a minimum, a general description of the control device(s); normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective action procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; and provisions for annual inspections during planned maintenance outages.
- The O&M manuals shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges where applicable, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, any specific control device monitoring parameter(s) required under any permit condition in this permit, unless DEQ approves their removal from this permit condition. The control device monitoring program shall be developed by the permittee based on performance test results, vendor data, and/or other supporting documentation.

[DRAFT]

2.7 Corrective Action

Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards, unless DEQ determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required.

[DRAFT]

Monitoring and Recordkeeping Requirements

2.8 Monitoring Steam Output

The permittee shall monitor and record the hourly and annual steam output of the boiler to demonstrate compliance with Permit Condition 2.3. Records of this information shall be maintained on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

[DRAFT]

2.9 Performance Test

Within one hundred eighty (180) days of the notification required by General Provision 5 of the initial date of achieving the maximum production rate, a compliance test shall be conducted to demonstrate compliance with Permit Condition 2.3. Testing shall be conducted in accordance with IDAPA 58.01.01.157, and the following:

- Prior to conducting the test, the permittee shall address the required averaging period specified in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.

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- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the steam production rate of the boiler, fuel feed rate in tons per hour, and pressure drop across the multiclone during each test.
- For the fuel used during the source test, the permittee shall record the fuel's highest heating value and fuel's analysis result, including ash content.
- If the PM measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 2.3, no further testing shall be required during this term of the permit. If the PM measured during the initial compliance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 2.3, a second test shall be required in the third year of the permit term. If the PM measured during the initial compliance test is greater than 90% of the emission standard in Permit Condition 2.3, the permittee shall conduct a compliance test annually.
- The permittee may establish new operating parameters by conducting a performance test that demonstrates compliance with Permit Condition 2.3 while operating at the alternative operating parameters. The performance test shall be conducted in accordance with the Test Methods and Procedures specified in the Rules (IDAPA 58.01.01.157) and in accordance with a DEQ-approved source test protocol. All operating parameters specified in this permit condition shall be continuously monitored and recorded during each test run. The permittee may request to operate outside of the operating ranges specified by the manufacturer during the performance test by submitting a written source protocol to DEQ for approval and requesting to operate under alternative operating parameters during the duration of the test. The protocol shall describe how the operating parameters will be monitored during the performance test. Once the source test is completed, the permittee may request in writing to operate in accordance with alternative operating parameters. The request shall include a source test report and justification for the alternative operating parameters. Upon receiving DEQ written approval of the source test and the requested alternative operating parameters, the permittee shall operate in accordance with those DEQ-approved alternative operating parameters. A copy of DEQ's approval shall be maintained on site with a copy of this permit.

[DRAFT]

2.10 Retention of O&M Manual

The O&M manual shall be maintained onsite and shall be made available to DEQ representatives upon request.

Reporting Requirements

2.11 40 CFR 60, Subpart Dc –Record and Maintain Records Of Fuels Combusted

In accordance with 40 CFR 60.48c(g)(2), the permittee shall record and maintain records of the amounts of each fuel combusted during each calendar month.

[DRAFT]

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2.12 40 CFR 60, Subpart Dc – Notification Requirements

In accordance with 40 CFR 60.48c(a), the permittee shall submit notification of the date of construction or reconstruction and actual startup of the Nebraska boiler, as provided by 40 CFR 60.7 of this part. This notification shall include:

- In accordance with 40 CFR 60.48c(a)(1), date of construction or reconstruction:
- In accordance with 40 CFR 60.48c(a), date of anticipated startup:
- In accordance with 40 CFR 60.48c(a), date of actual startup:

[DRAFT]

2.13 40 CFR 60, Subpart Dc –Recordkeeping

In accordance with CFR 60.48c(i), the permittee shall maintain all records required under Permit Condition 2.11 for a period of two years following the date of such record.

[DRAFT]

2.14 40 CFR 60, Subpart Dc –Duration of Reporting Period

In accordance with CFR 60.48c(j), the reporting period for the reports required under Permit Conditions ~~3.8 and 3.9~~ 2.11 is each six-month period. All reports shall be submitted to DEQ and shall be postmarked by the 30th day following the end of the reporting period.

[DRAFT]

2.15 NSPS Subpart A (40 CFR 60) Summary of General Provisions for Affected Facilities

Generally applicable reporting, record keeping and notification requirements of Subpart A of the New Source Performance Standards (NSPS, 40 CFR 60) are included in Table 3.2. These summaries are provided to highlight the notification and record keeping requirements of 40 CFR 60 for affected facilities, and are not intended to be a comprehensive listing of all general provisions requirements that may apply. Should there be a conflict between these summaries and the NSPS, the NSPS shall govern. The permittee is encouraged to read all of 40 CFR 60 Subpart A. The CFRs are available on-line at: <http://www.gpoaccess.gov/cfr/index.html>.

[DRAFT]

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Table 3.2 NSPS SUBPART A (40 CFR 60) SUMMARY OF GENERAL PROVISIONS FOR AFFECTED FACILITIES

Section	Section Title	Summary of Section Requirements
60.4	Address	<p>All notifications and reports shall be submitted to:</p> <p>Pocatello Regional Office Department of Environmental Quality 444 Hospital Way, Suite 300 Pocatello, ID 83201 Phone: (208) 236-6160</p>
60.7(b),(c)(d) and (f)	Notification and Record Keeping	<ul style="list-style-type: none"> • Notification of commencement of construction postmarked no later than 30 days of such date. • Notification of startup postmarked within 15 days of such date. • Notification of physical or operational change that may increase emissions postmarked 60 days before the change is made. • Maintain records of the occurrence and duration of any: startup, shutdown or malfunction of the affected source; malfunction of air pollution control device; and any period when a continuous monitoring system or monitoring device is inoperative. • For affected units with continuous monitoring device requirements report excess emissions and monitoring system performance semiannually, postmarked by January 30th and July 30th (in the format required by NSPS). • Maintain in a permanent form records suitable for inspection of all measurements, system testing, performance measurements, calibration checks, and adjustments/maintenance performed. Records shall be maintained for a period of two years from the date the record is required to be generated by the applicable regulation. • CEMS record keeping requirements depending on whether data is automatically or manually recorded - 40 CFR 60.7(f).
60.11(a),(b),(c), (d) and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> • Other than opacity standards, where performance tests are required compliance with standards is determined by methods and procedures established by 40 CFR 60.8. • Compliance with NSPS opacity standards shall be determined by Method 9 of Appendix A. The owner or operator may elect to use COM measurements in lieu of Method 9 provided notification is made at least 30 days before the performance test. • At all times, including periods of startup, shutdown, and malfunction to the extent practicable, the operator shall maintain and operate any affected facility and air pollution control equipment consistent with good air pollution control practices. • For the purposes of determining compliance with standards any creditable evidence may be used if the appropriate performance or compliance test procedure has been performed.
60.12	Circumvention	<p>No owner or operator shall build, erect, install or use any article or method, including dilution, to conceal an emission which would otherwise constitute a violation.</p>
60.14	Modification	<ul style="list-style-type: none"> • Physical or operational changes to source types that are regulated by a NSPS which result in an increase in hourly emissions to which a standard applies is considered a modification (unless expressly exempted the NSPS). Modified sources become subject to the NSPS standards • Note that in accordance with IDAPA 58.01.01.201 no owner or operator may commence a modification without first obtaining a permit to construct unless the modification is exempted from the need to obtain a permit in accordance with IDAPA 58.01.01.220-223.

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3. DRYING KILN

3.1 Process Description

The drying kiln is used to finish drying lumber that is too wet for processing. The drying kiln has a capacity of 30,000 board feet.

3.2 Emissions Control Description

Table 3.1 | EMISSIONS UNIT NAME | DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Drying Kiln	N/A	Drying Kiln Vents

Emissions Limits

3.3 Emissions Limits

The PM₁₀ emissions from the drying kiln shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 LIME KILN EMISSIONS LIMITS

Source Description	PM ₁₀	
	lb/hr	T/yr
Drying Kiln	0.04	0.19

[Draft]

3.4 Opacity Limit

Emissions from the kiln vents, or any other stack, vent, or functionally equivalent opening associated with the kiln, 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.

[Draft]

Operating Requirements

3.5 Kiln Throughput Limits

The kiln throughput shall not exceed the following:

- 2,000,000 Brdft/yr
- 228.31 Brdft/hr

[Draft]

Monitoring and Recordkeeping Requirements

3.6 Kiln Throughput Monitoring

The permittee shall monitor and record the ~~hourly~~ daily throughput, in Brdft/hr, and annual throughput, in Brdft/yr, of the kiln in order to demonstrate compliance with Permit Condition 3.3.

[Draft]

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3.7 Visible Emissions Monitoring

The permittee shall conduct a monthly inspection of visible emissions from the drying kiln, 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.

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4. CYCLONES

4.1 Process Description

Nine cyclones pneumatically transfer wood waste from the sanding, planning, and trimming operations to their respective bins.

4.2 Emissions Control Description

Table 4.1 [EMISSIONS UNIT NAME] DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Cyclone 1	N/A	Cyclone 1 Stack
Cyclone 2	N/A	Cyclone 2 Stack
Cyclone 3	N/A	Cyclone 3 Stack
Cyclone 4	N/A	Cyclone 4 Stack
Cyclone 5	N/A	Cyclone 5 Stack
Cyclone 6	N/A	Cyclone 6 Stack
Cyclone 7	N/A	Cyclone 7 Stack
Cyclone 9	N/A	Cyclone 9 Stack
Cyclone 10	N/A	Cyclone 10 Stack

[Draft]

Emissions Limits

4.3 Emissions Limits

The PM₁₀ emissions from the cyclone stacks shall not exceed any corresponding emissions rate limits listed in Table 4.2.

Table 4.2 CYCLONES EMISSIONS LIMITS

Source Description	PM ₁₀	
	lb/dy hr	T/yr
Cyclone 1	44.16 1.84	3.38
Cyclone 2	47.76 1.99	4.13
Cyclone 3	52.08 2.17	4.51
Cyclone 4	17.76 0.74	0.15
Cyclone 5	17.76 0.74	0.15
Cyclone 6	17.76 0.74	1.53
Cyclone 7	8.64 0.36	0.004
Cyclone 9	80.40 3.35	6.96
Cyclone 10	90.24	7.82

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	3.76	
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[Draft]

4.4 Opacity Limit

Emissions from the cyclone stacks, or any other stack, vent, or functionally equivalent opening associated with the cyclones, 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.

[Draft]

Operating Requirements

4.5 Hours of Operation And Flowrate Limitations

The hours of operation of the cyclones shall not exceed any corresponding limits listed in Table 4.3.

Table 4.3 CYCLONES & TARGET BOX EMISSIONS LIMITS

Source Description	Average Daily Exhaust Flow	Hours of Operation
	Acfm	hr/yr
Cyclone 1	14320 ^{a,b} @ 104.8 AMPS	4160
Cyclone 2	15463 ^{ab} @ 103.8 AMPS	4160
Cyclone 3	16875 ^a @ 86.3 AMPS	4160
Cyclone 4	5741 ^a @ 25 AMPS	420
Cyclone 5	5741 ^a @ 19 AMPS	420
Cyclone 6	5741 ^a @ 25 AMPS	4160
Cyclone 7	2812 @ 17 AMPS	20
Cyclone 9	35500 ^a @ 100.5 AMPS	4160
Cyclone 10	39900 ^a @ 157 AMPS	4160

^a based on average of 24 consecutive hourly readings.

^b multiple blowers per cyclone

[Draft]

4.6 Flowrate Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to continuously daily measure the exhaust flowrate of each cyclone listed in Table 4.2.

[Draft]

4.7 O&M Manual

The permittee shall have developed an O&M manual for each cyclone listed in Table 2.2. according to manufacturer specifications and recommendations. This manual shall describe the methods and procedures that will be followed to assure the cyclones are maintained in good working order and operated as efficiently as practical. This manual shall also document the maximum and minimum

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flowrate, in ACFM, that each cyclone listed in Table 4.2 will used to demonstrate compliance with Permit Condition 4.3. Determinations of whether acceptable operating and maintenance procedures are being used will be based on information available to DEQ which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[Draft]

Monitoring and Recordkeeping Requirements

4.8 Flowrate

The permittee shall monitor and record ~~hourly daily exhaust flow, motor amperage associated with in~~ ACFM, and ~~the average daily exhaust flow, in ACFM, of of~~ each cyclone listed in Table 4.3 in order to demonstrate compliance with Permit Condition 4.5. ~~The average daily exhaust flow shall be determined by summing hourly exhaust flow over the previous consecutive 24 hour period and dividing by 24.~~

[Draft]

4.9 Hours of Operation

The permittee shall monitor and record annual hours of operation of each cyclone listed in Table 4.3 in order to demonstrate compliance with Permit Condition 4.5.

[Draft]

4.10 Performance Test

The permittee may establish new flowrate values for each cyclone listed in Table 4.2 by conducting a performance test that demonstrates compliance with Permit Condition 4.3 while operating at the alternative flowrate parameters. The performance test shall be conducted in accordance with the Test Methods and Procedures specified in the Rules (IDAPA 58.01.01.157), a DEQ-approved source test protocol, and the following:

- Prior to conducting the test, the permittee shall address the required averaging period specified in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.
- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the steam production rate of the boiler, fuel feed rate in tons per hour, and pressure drop across the multiclone during each run of the test.
- For each cyclone tested, the permittee shall monitor and record the average flowrate, in ACFM, of each run of the test.

All operating parameters specified above shall be continuously monitored and recorded during each test run. The permittee may request to operate outside of the operating ranges specified by the manufacturer during the performance test by submitting a written source protocol to DEQ for approval and requesting to operate under alternative operating parameters during the duration of the test. The protocol shall

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describe how the operating parameters will be monitored during the performance test. Once the source test is completed and then approved by DEQ, the permittee may request in writing to operate in accordance with alternative operating parameters. The request shall include a source test report and justification for the alternative operating parameters. Upon receiving DEQ written approval of the source test and the requested alternative operating parameters, the permittee shall operate in accordance with those DEQ-approved alternative operating parameters. A copy of DEQ's approval shall be maintained on site with a copy of this permit.

[Draft]

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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]

Excess Emissions

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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)]