



**Air Quality Permitting  
Statement of Basis**

**December 4, 2007**

**Tier I Operating Permit No. T1-060125**

**Riley Creek Lumber Company, Laclede**

**Facility ID No. 017-00027**

**Prepared by:**

A handwritten signature in black ink, appearing to be "TD", is written to the right of the "Prepared by:" text.

**Tracy Drouin, Permit Writer  
Air Quality Division**

**FINAL**

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## Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	Hazardous Air Pollutants
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
MACT	Maximum Available Control Technology
MMbdf	million board feet
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	Permit to Construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
T/R	transformer-rectification
T/yr	Tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

## **Public Comment / Affected States / EPA Review Summary**

A 30-day public comment period for the Riley Creek Lumber Company Tier I operating permit was held in accordance with IDAPA 58.01.01.364, Rules for the Control of Air Pollution in Idaho.

IDAPA 58.01.01.008.01 defines affected states as: “All states: whose air quality may be affected by the *emissions of the Tier I source and that are contiguous to Idaho; or that are within 50 miles of the Tier I source.*”

A review of the site location information included in the permit application indicates that the facility is located within 50 miles of a state border. Therefore, Montana, Washington and Coeur D’ Alene Indian Reservation were provided an opportunity to comment on the draft Tier I operating permit.

## 1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362.

The Department of Environmental Quality (DEQ) has reviewed the information provided by Riley Creek Lumber Company regarding the operation of its facility located in Laclede. This information was submitted based on the requirements to submit a Tier I operating permit application in accordance with IDAPA 58.01.01.313.03.

## 2. FACILITY DESCRIPTION

Riley Creek Lumber Company operates a lumber mill that processes raw logs into dried lumber. The mill consists of a sawmill, drying kilns, a planer mill, and associated equipment. A steam plant consisting of two wood-fired boilers provides steam to the facility. The facility has the potential to operate 24 hours per day, seven days per week, 52 weeks per year, processing up to 240,000 million board feet (MMbdf) annually.

Logs are delivered to the mill by truck and stored in the log decks until processed. Logs are transported by loaders to the debarking area, where bark is removed from the logs. Bark from the debarkers is shredded through a hog and then conveyed to a drop pile, where it can be transferred by a front-end loader to the boiler fuel storage bin, the hog fuel pile, or to trucks for off-site sale. Fuel from the boiler fuel storage bin is augered to boiler No. 1 and fuel from the hog fuel pile is loaded into a hopper and conveyed to boiler No. 2.

Debarked logs enter the sawmill and are cut into lumber. Waste wood generated during edging is processed in a chipper and screened to separate fines and chips. The wood chips are pneumatically transferred to the railcar target box or conveyed to the chip truck bin for loadout and sale. Sawmill fines are combined with sawmill sawdust and conveyed to a truck bin for loadout.

Lumber is sorted, stacked, and then dried in steam-heated kilns. Each kiln has multiple roof vents used to control the temperature within each kiln by releasing hot air from inside the kilns.

Lumber is then transferred to the planer mill, where it is planed and trimmed. The trimmed ends are chipped and transferred pneumatically to the railcar target box. The shavings are conveyed from the cyclone to a truck bin for loadout.

Finished lumber is then sorted, graded, stacked, wrapped, and stored until shipped off-site by truck or rail car.

## 3. FACILITY/AREA CLASSIFICATION

This facility is a major facility as defined by IDAPA 58.01.01.008.10 because it emits or has the potential to emit PM/PM<sub>10</sub> and CO in amounts greater than or equal to major facility threshold(s) listed in Subsection 008.10. Refer to Section 6.2 of this document for a complete emissions inventory of the air pollutants emitted by this facility.

This facility is not a designated facility as defined by IDAPA 58.01.01.006.27.

This facility is a major facility as defined by IDAPA 58.01.01.205 because it emits or has the potential to emit CO in amounts greater than or equal to 250 tons per year.

The Standard Industrial Classification (SIC) defining the facility is 2421, and the Aerometric Information Retrieval System (AIRS) facility classification is A.

The facility is located in Laclede, which is classified as unclassifiable for all criteria pollutants. There is not a Class I area(s) within 10 kilometers (km) of the facility. This facility is located in Air Quality Control Region (AQCR) 63 and Universal Transverse Mercator (UTM) Zone 11.

#### 4. APPLICATION SCOPE

- Renew Tier I operating permit
- Remove references to the Olivine burner
- Add EPA Test Method 25a and express VOCs as carbon
- Increase the steaming rate for boiler No. 1 from 40,200 lb/hr of steam to 44,200 lbs/hr of steam
- Include applicable CAM requirements

#### 5. SUMMARY OF EVENTS

July 27, 2006	DEQ received application
September 21, 2006	DEQ determined application complete
May 15, 2007	DEQ determined that CAM applies and requests additional information
July 9, 2007	DEQ received CAM plan
July 13, 2007	DEQ determined submitted CAM plan was deficient
August 13, 2007	Facility submitted revised CAM plan
September 20, 2007	Draft permit sent to regional office/peer review
October 24, 2007	Public comment period began
November 23, 2007	Public comment period ended
November 26, 2007	Proposed permit sent to EPA for review
December 4, 2007	Final permit issued

##### 5.1 Permitting History

March 1, 1984	Air Pollution Source Permit No. 0240-0027 was issued
February 28, 1985	Air Pollution Operating Permit No. 0240-0027 was issued
January 13, 1989	Permit to Construct No. 0240-0027 was issued
December 31, 1996	Permit to Construct No. 017-00027 was issued
July 21, 1997	Director's exemption for installation of two drying kilns
June 26, 2001	Permit to Construct No. 017-00027 was issued
July 10, 2001	Enforcement Consent Order to install baghouse on the planer shavings cyclone
July 30, 2002	Tier I Operating Permit No. 017-00027 was issued.

#### 6. PERMIT ANALYSIS

##### 6.1 Basis of Analysis

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- PTC No. 017-00027, issued June 26, 2001
- Tier I Operating Permit No. 017-00027, issued July 30, 2002
- Tier I Operating Permit application received July 27, 2006
- Compliance certification received July 27, 2006
- Compliance assurance monitoring (CAM) plan received August 13, 2007
- Guidance developed by the U.S. Environmental Protection Agency (EPA) and DEQ

## **6.2 Emissions Description and Emissions Inventory**

The primary emissions from Riley Creek's Laclede facility are gaseous emissions formed as combustion by-products during operation of the two boilers. The criteria pollutants of concern are CO and PM.

No changes have occurred at the facility that would increase the facility's emissions compared to the previous Tier I Operating Permit term.

An emissions inventory has not been reproduced within this document; however, Riley Creek's Tier I permit renewal application, dated July 24, 2006 and received by DEQ on July 27, 2006, contains the emissions inventory for the sources regulated in the permit.

## **7. REGULATORY ANALYSIS**

### **7.1 IDAPA 58.01.01.313.03 – Renewals of Tier I Operating Permits**

This permitting action is required to renew the facility's current Tier I operating permit. The application was submitted on July 27, 2006, which is greater than the required six months prior to the expiration date of the permit.

### **7.2 New Source Performance Standards (NSPS) – 40 CFR 60**

#### **7.2.1 40 CFR 60 Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

The facility does not currently have any stationary ignition internal combustion engines that are subject to NSPS 40 CFR 60, Subpart IIII, according to the application submitted by the facility. If the facility obtains engines in the future that are determined to be exempt from IDAPA 58.01.01 Rules, it is possible that NSPS 40 CFR 60, Subpart IIII may still apply. If this is the case, it is the facility's responsibility to comply with NSPS 40 CFR 60, Subpart IIII, even if it is not specifically addressed in facility's air permit.

### **7.3 National Emission Standards for Hazardous Air Pollutants (NESHAPS) – 40 CFR Parts 61 & 63**

Riley Creek Lumber Company has not been a major source of HAPs in the past. However, new emission factors were developed by Oregon State University test data in early 2007. It was determined from the test data that certain HAPs emissions are much higher than previously thought. Idaho DEQ sent a letter dated August 28, 2007 to Riley Creek Lumber Company regarding the new lumber drying kiln emissions data. The letter also requests that the facility determine if the potential to emit using the new emission factors developed from OSU test data determines that the facility is a major source for HAP emissions.

### **7.3.1 40 CFR 63, Subpart DDDD- Plywood and Composite Wood Products**

This subpart applies to lumber kilns at any facility that is a major source of HAPS. For kilns, only the initial notification requirements in Section 63.9(b) apply. Since Riley Creek has not been a major source of HAPS in the past, a notification has not been made. As indicated above and in the Idaho DEQ letter sent to the facility, the facility needs to determine if it is a major source of HAPS.

On June 19, 2007, the D.C. Circuit Court of Appeals vacated and partially remanded a portion of EPA's Maximum Achievable Technology Standards (MACT) for the Plywood and Composite Wood Products source category. Only the low risk option and the automatic compliance extension to October 1, 2008 were vacated. The initial notification requirements still apply.

On October 29, 2007, previously vacated portions of this MACT were reinstated with a compliance date of October 1, 2008.

### **7.3.2 40 CFR 63, Subpart DDDDD- Boiler MACT**

This subpart establishes emission limits and work practice standards for HAPS emitted from industrial, commercial, and institutional boilers and process heaters. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

This subpart may apply to the boilers if the facility determines they are a major source of HAPS. The subpart was vacated on June 8, 2007. Section 112(j) applies. DEQ is waiting for further guidance from EPA regarding the deadline and timing of 112(j) as it applies to the fully vacated MACTs.

### **7.4 Compliance Assurance Monitoring (CAM) – 40 CFR 64**

It was determined that boiler No. 1 and boiler No. 2 were subject to CAM. The regulated pollutant in this case is PM (a surrogate for PM<sub>10</sub>). Boiler No. 1 and boiler No. 2 each have a multiclone and an electrostatic precipitator for emissions control. The following criteria were evaluated for the CAM applicability determination in accordance with 40 CFR 64:

- Pollutant specific emissions unit is located at a major source that is required to obtain a Title V permit (Riley Creek Lumber Company is a major source because criteria pollutant emissions of PM, CO and NO<sub>x</sub> are greater than 100 T/yr)
- Pollutant specific emissions unit is subject to an emission limitation or standard for the applicable emission limitation or standard (Boiler Nos. 1 and 2 are each subject to an emission limitation for PM)
- Pollutant specific emissions unit uses a control device to achieve compliance with the applicable emission limitation or standard (Boiler Nos. 1 and 2 each use a multiclone and electrostatic precipitator to achieve compliance with the PM emission limit)
- Potential pre-control emissions of applicable regulated pollutant from the unit are greater than the major source threshold (Boiler Nos. 1 and 2 each have pre-control PM emissions greater than 100 T/yr)

Based on this information, it was determined that boiler No. 1 and boiler No. 2 were subject to CAM.

In accordance with 40 CFR 64.4, Riley Creek Lumber Company submitted a CAM plan for boiler No. 1 and boiler No. 2 which addressed the associated multiclones and ESPs. The facility does not have a COMs or CEMS for compliance assurance. The CAM plan submittal addressed the following (see Table 7.1 below) in accordance with 40 CFR 64.4(a):

- Indicators to be monitored
- Ranges or designated conditions for the indicators, or the process by which such indicator ranges or designated conditions shall be established
- Performance criteria for the monitoring to satisfy 40 CFR 64.3(b).

It was determined that the CAM plan submitted by the facility met the submittal requirements for CAM. The facility does not have a COMs or CEMS, so there was not a correlation shown for visible emissions and PM emissions. However, the CAM plan did include results of a May 2004 source test which resulted in PM emissions well below the permit limit for PM.

The boiler fuel (hogfuel) is not a uniform fuel. The hogfuel may at times contain moisture or sediment from the general production and storage of the hogfuel at the facility. When used as fuel, hogfuel does not combust evenly due to the varying amounts of feedrate, potential moisture, and/or sediment content. Based on this fact, it would be difficult to assure compliance through visible emissions (because of condensed water vapor in the plume) or to establish a consistent operational range. However, based on source test results, historical operational data and information submitted as part of the CAM plan, as long as the multiclones and ESPs are operated and maintain properly as required by the permit, the facility should be in compliance with the PM limits.

#### Boiler Multiclone and ESP CAM Permit Conditions

Based on the CAM plan submitted by the facility and on EPA guidance for CAM for electrostatic precipitators, permit conditions were written establishing the following:

- Multiclones and ESPs are required to be used to control PM emissions from the associated boilers. (40 CFR 64.6(b))
- The definition of an exceedance and an excursion were written, with the required action if an exceedance or excursion is detected (see Table 7.1 below).
- A requirement to submit reports in accordance with 40 CFR 64.9 and Permit Condition 2.12.

**Table 7.1 Summary List of Tier I Permit Conditions Relative to CAM Requirements**

Subpart 64 Citation	CAM Requirements for Tier I Permit	Tier I Permit Requirement	Tier I Permit Condition(s)
40 CFR 64.6(c)(1)	Indicators to be monitored	1) Secondary current and voltage of the ESPs 2) Differential pressure through the multiclone tubes	3.9, 3.12, 4.10, 4.13
	Method of measuring the indicators	1) Inspections 2) Meter readings	3.19, 3.21, 4.20, 4.22
	Performance criteria for assessing indicators	Manufacturer's recommendations and O&M Manual	3.9, 3.11, 3.12, 4.10, 4.12, 4.13
40 CFR 64.6(c)(2)	Means for defining exceedances or excursions	Manufacturer's recommendations and O&M Manual	3.11, 4.12
	Level which constitutes an exceedance or excursion, or the means by which that level will be defined	Any exceedance of manufacturer's recommendations and O&M Manual	3.9, 3.11, 3.12, 4.10, 4.12, 4.13
	Averaging period associated with exceedances or excursions	Instantaneous / standard applies to any exceedance	N/A
	Procedures for notifying DEQ of the establishment or reestablishment of any exceedance or excursion level	1) Annual and semi-annual reporting requirements 2) Updated O&M Manual requirements	2.12, 3.11, 4.12
40 CFR 64.6(c)(3)	The obligation to conduct monitoring and satisfy the requirements of 40 CFR 64.7 through 64.9	Contained in monitoring requirements of Tier I permit	3.19, 3.21, 4.20, 4.22
40 CFR 64.6(c)(4)	If appropriate, the minimum data availability requirement for valid data collection for each averaging period	Not necessary for this permit	N/A
	If appropriate, the minimum data availability requirement for the averaging periods in a reporting period	Not necessary for this permit	N/A

As CAM plans are implemented, Riley Creek Lumber Company, Laclede should periodically review monitoring data to determine the need for additional measures to assure compliance with the applicable emission standards or limits. If an excursion or exceedance is detected, the facility must take the corrective actions necessary as specified by Permit Conditions 3.13 and 4.14 to return the emissions unit and control system to normal operation and minimize the likelihood that similar excursions or exceedances recur. If the facility determines that deviations occurred that the monitoring did not indicate as an excursion or exceedance, or if the results of a subsequent compliance test indicate that the indicator ranges must be modified, 40 CFR 64.7(e), requires the facility to notify DEQ promptly. If a permit revision is required, the facility must identify proposed revisions to the CAM submittal and submit the proposed revisions to DEQ for review and approval prior to implementing the revised plan.

After reviewing the report of excursions or exceedances, subsequent corrective actions taken, monitoring data, and other relevant information, DEQ may require the source to develop and implement a quality improvement plan (QIP). If a QIP is required, Riley Creek Lumber Company must develop and implement the QIP as quickly as possible and must notify DEQ if more than 180 days will be required for completing the improvements specified. If it is determined that a QIP is inadequate, DEQ may require the source to modify the QIP.

## 8. PERMIT CONDITIONS

This section describes only the changes made to the permit as a result of this permitting action. Existing permit conditions are identified as "Existing Permit Condition", and revised permit conditions are identified as "Revised Permit Condition." New permit conditions are identified as "New Permit Condition."

All permit sections have been renumbered, and reformatted in order to update the permit format. Permit Sections 1 through 7 have been renumbered to Permit Sections 2 through 8.

The facility-wide requirements and general provisions sections have been updated to incorporate the latest language pertaining to those permit conditions. The test method table in facility-wide conditions has also been updated to include test method 25A and express VOCs as carbon.

References to the Olivine burner were removed from the permit. This equipment is no longer in operation at the facility and has been removed from the site.

The only other changes to permit conditions were for Boiler No. 1 and Boiler No. 2 emission unit sections in the permit. The changes to these sections are discussed below.

### **Perry Smith Abco-Wood-Fired Boiler, Boiler No. 1**

#### **8.1 Existing Permit Condition 2.5**

The maximum steaming rate of boiler No. 1 shall not exceed 40,200 lb/hr of steam, averaged over a three-hour period. The allowable steaming rate can be modified by conducting a source test(s), which demonstrates compliance with applicable standards. In any case where the allowable steaming rate is modified by a source test(s), the maximum allowable steaming rate shall be limited to 120% of the average steaming rate attained during any compliance test period, for which a test protocol has been granted prior approval by the DEQ, unless (1) the test demonstrates noncompliance, (2) a more restrictive steaming limit is specified elsewhere in this permit, or (3) at such an steaming rate, emissions would exceed any emission limit(s) set forth in this permit.

#### **8.2 Revised Permit Condition 3.5**

The maximum steaming rate of boiler No. 1 shall not exceed 44,200 lb/hr of steam, averaged over a three-hour period. The allowable steaming rate can be modified by conducting a source test(s), which demonstrates compliance with applicable standards. In any case where the allowable steaming rate is modified by a source test(s), the maximum allowable steaming rate shall be limited to 120% of the average steaming rate attained during any compliance test period, for which a test protocol has been granted prior approval by the DEQ, unless (1) the test demonstrates noncompliance, (2) a more restrictive steaming limit is specified elsewhere in this permit, or (3) at such an steaming rate, emissions would exceed any emission limit(s) set forth in this permit.

This permit condition was revised to increase the allowable steaming rate from 40,200 lb/hr of steam to 44,200 lb/hr of steam based on a May 4, 2004 source test for the boiler and a July 2, 2004 letter from DEQ stating that the allowable steaming rate for the boiler is 44,200 lb/hr. The facility requested the steaming rate increase be incorporated into the Tier I renewal.

**8.3 Existing Permit Condition 2.9**

In accordance with PTC No. 017-00027 dated June 26, 2001, the permittee shall have developed an O&M manual for the ESP and shall contain according to manufacturer specifications and recommendations. This manual shall describe the methods and procedures that will be followed to assure the ESP is maintained in good working order and operated as efficiently as practical. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

**8.4 Revised Permit Condition 3.11**

The permittee shall have developed an O&M manual for the ESP and shall contain according to manufacturer specifications and recommendations (including voltage and amperage range specifications) and shall be updated as necessary. This manual shall describe the methods and procedures that will be followed to assure the ESP is maintained in good working order and operated as efficiently as practical. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

This permit condition was revised to include specific voltage and amperage range specifications and to require updating of the O&M manual as necessary. The revision is more specific to comply with CAM requirements. 40 CFR 64.6 was also added as a citation under the permit condition.

**8.5 New Permit Condition 3.8**

The associated multiclone and ESP shall be operated anytime boiler No. 1 is operated to control PM.

This permit condition was added to comply with CAM requirements. Operation of the emission control equipment will in part assure compliance with PM emission limits.

**8.6 New Permit Condition 3.9**

The associated multiclone shall be operated with a differential pressure between 0.5 AND 5.9 inches in the water column.

This permit condition was added to comply with CAM requirements. Proper operation of the emission control equipment will in part assure compliance with PM emission limits as recommended by the manufacturer according to the applicant.

**8.7 New Permit Condition 3.13**

Upon detection of an excursion or exceedance (indicators outside of manufacturer or O&M Manual specification range), the permittee shall restore operation of boiler no. 1, the associated multiclone and ESP, and the ESP power input monitoring system to the normal or usual manner of operation as expeditiously as practicable, in accordance with good air pollution control practices for minimizing emissions, and in accordance with the provisions of 40 CFR 64.7(d).

This permit condition was added to comply with CAM requirements.

**8.8 New Permit Condition 3.21**

The permittee shall monitor and record at least once daily the differential pressure in the water column of the multiclone associated with boiler No. 1.

This permit condition was added to comply with CAM requirements. Monitoring for proper operation of the emission control equipment will in part assure compliance with PM emission limits.

**8.9 New Permit Condition 3.27**

The permittee shall submit required reports in accordance with Permit Condition 2.12 and 40 CFR 64.9.

This permit condition was added to comply with CAM reporting requirements.

Citations to the CAM rule were also added to Permit Conditions 3.12 and 3.19 since they also comply with CAM requirements.

**Kipper and Sons-Wood-Fired Boiler, Boiler No. 2**

**8.10 Existing Permit Condition 3.10**

In accordance with PTC No. 017-00027 dated June 26, 2001, the permittee shall have developed an O&M manual for the ESP and shall contain according to manufacturer specifications and recommendations. This manual shall describe the methods and procedures that will be followed to assure the ESP is maintained in good working order and operated as efficiently as practical. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

**8.11 Revised Permit Condition 4.12**

The permittee shall have developed an O&M manual for the ESP and shall contain according to manufacturer specifications and recommendations (including voltage and amperage range specifications) and shall be updated as necessary. This manual shall describe the methods and procedures that will be followed to assure the ESP is maintained in good working order and operated as efficiently as practical. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

This permit condition was revised to include specific voltage and amperage range specifications and to require updating of the O&M manual as necessary. The revision is more specific to comply with CAM requirements. 40 CFR 64.6 was also added as a citation under the permit condition.

**8.12 New Permit Condition 4.9**

The associated multiclone and ESP shall be operated anytime boiler No. 2 is operated to control PM.

This permit condition was added to comply with CAM requirements. Operation of the emission control equipment will in part assure compliance with PM emission limits.

**8.13 New Permit Condition 4.10**

The associated multiclone shall be operated with a differential pressure between 0.5 and 5.9 inches in the water column.

This permit condition was added to comply with CAM requirements. Proper operation of the emission control equipment will in part assure compliance with PM emission limits.

**8.14 New Permit Condition 4.14**

Upon detection of an excursion or exceedance (indicators outside of manufacturer or O&M Manual specification range), the permittee shall restore operation of boiler no. 2, the associated multiclone and ESP, and the ESP power input monitoring system to the normal or usual manner of operation as expeditiously as practicable, in accordance with good air pollution control practices for minimizing emissions, and in accordance with the provisions of 40 CFR 64.7(d).

This permit condition was added to comply with CAM requirements.

**8.15 New Permit Condition 4.22**

The permittee shall monitor and record at least once daily the differential pressure in the water column of the multiclone associated with boiler No. 2.

This permit condition was added to comply with CAM requirements. Monitoring for proper operation of the emission control equipment will in part assure compliance with PM emission limits.

**8.16 New Permit Condition 4.28**

The permittee shall submit required reports in accordance with Permit Condition 2.12 and 40 CFR 64.9.

This permit condition was added to comply with CAM reporting requirements.

Citations to the CAM rule were also added to Permit Conditions 4.13 and 4.20 since they also comply with CAM requirements.

**9. INSIGNIFICANT ACTIVITIES**

The following activities and emission units are listed in Section 7 of the Tier I operating permit as insignificant activities under IDAPA 58.01.01.317.01.b.i.

**Table 9.1 INSIGNIFICANT ACTIVITIES**

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
Sawmill, indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Sawmill screen (classifier), indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Sawmill chipper, indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Planer, indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Planer chipper, indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Planer trimmer, indoor	IDAPA 58.01.01.317.01(b)(i)(30)
Planer shavings convey	IDAPA 58.01.01.317.01(b)(i)(30)
Planer shavings bin truck loadout	IDAPA 58.01.01.317.01(b)(i)(30)
Fire water pump	IDAPA 58.01.01.317.01(b)(i)(30)
Small generators and compressors	IDAPA 58.01.01.317.01(b)(i)(6)

**10. ALTERNATIVE OPERATING SCENARIOS**

The facility did not request any alternative operating scenarios.

## **11. TRADING SCENARIOS**

The facility did not request any trading scenarios.

## **12. COMPLIANCE SCHEDULE**

### **12.1 Compliance Certification**

Riley Creek Lumber Company, Laclede is required to periodically certify compliance in accordance with General Provision 21. The facility shall submit an annual compliance certification for each emissions unit to DEQ and EPA, in accordance with IDAPA 58.01.01.322.11. The compliance certification report shall address the compliance status of each emissions unit with the terms and conditions of this permit.

## **13. PERMIT REVIEW**

### **13.1 Regional Review of Draft Permit**

DEQ provided the draft permit to its Coeur D' Alene Office on September 21, 2007. Minor comments were received and have been incorporated into the permit.

### **13.2 Facility Review of Draft Permit**

DEQ provided the draft permit to Riley Creek Lumber Company, Laclede for its review on September 26, 2007. The facility provided written comments on the draft permit on October 4, 2007.

### **13.3 Public Comment**

DEQ provided the draft permit for public comment. The public comment period was provided from October 24, 2007 to November 23, 2007. No comments were submitted in response to DEQ's draft permit. Montana, Washington and Coeur D' Alene Indian Reservation are within 50 miles of this Tier I Source and are affected states. As such, notification of the public comment period was provided as required by IDAPA 58.01.01.364.

## **14. ACID RAIN PERMIT**

This facility is not an affected facility as defined in 40 CFR 72 through 75; therefore, acid rain permit requirements do not apply.

## **15. REGISTRATION FEES**

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fees in accordance with IDAPA 58.01.01.387 apply. The facility is in compliance with registration and registration fee requirements.

TD/hp Permit No. T1-060125

**Appendix A - AIRS Data Entry Form**

**Riley Creek Lumber Company  
Laclede**

Tier I Operating Permit No. T1-060125

Facility ID No. 017-00027

# AIRS Data Entry Form

## AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

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 <sub>2</sub>	B							U
NO <sub>x</sub>	B							U
CO	A	A					A	U
PM <sub>10</sub>	A						A	U
PT (Particulate)	A						A	U
VOC	B							U
Total HAPs								U
			<b>APPLICABLE SUBPART</b>					

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- 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).
- NA = Not applicable as defined in IDAPA 58.01.01.579, constructed prior to baseline dates.