



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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C.L. "Butch" Otter, Governor
John H. Tippetts, Director

August 3, 2016

Ken Ropski, Plant Manager
Fiber Composites, LLC
420 West Franklin
Meridian, ID 83642

RE: Facility ID No. 001-00115, Fiber Composites, LLC, Meridian
Final Permit Letter

Dear Mr. Ropski:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2016.0026 Project 61716 to Fiber Composites, LLC located at Meridian for converting the Tier II operating permit to a Permit to Construct. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received May 3, 2016.

This permit is effective immediately and replaces Permit to Construct and Tier II Operating Permit No. P-2008.0001 issued on May 7, 2008. This permit does not release Fiber Composites, LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, AQ Compliance Officer, at (208) 373-0419 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Shawnee Chen at (208) 373-0502 or Shawnee.chen@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

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

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\SYC

Permit No. P-2016.0026 PROJ 61716

Enclosures

AIR QUALITY

PERMIT TO CONSTRUCT

Permittee Fiber Composites, LLC
Permit Number P-2016.0026
Project ID 61716
Facility ID 001-00115
Facility Location 420 West Franklin
Meridian, ID 83642

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) 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; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) 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; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho 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. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued August 3, 2016



Shawnee Chen, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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1. Permit Scope

Purpose

- 1.1 This permitting action is for converting the Tier II Operating Permit to a Permit to Construct (PTC). In addition, through this permitting action, Finishing Line #5 and Finishing Line #6 and their associated control equipment, Line #8 Molder Baghouse and Line #9 Molder Baghouse are removed from the permit because they are no longer onsite. [8/3/2016]
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin. [8/3/2016]
- 1.3 This PTC replaces Permit to Construct and Tier II Operating Permit No. P-2008.0001 issued on May 7, 2008. [8/3/2016]

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control
3	Storage Silo	Noltec Storage Silo Baghouse (C1A)
3	Primary Hammermill	Donaldson Baghouse (C3)
3	Trim End Hog	10 RA Baghouse (C17)
3	Wood Storage Silo	8 RA Baghouse (C18)
3	Secondary Hammermill	Big Mac Baghouse (C22)
3	Truck Dump	Truck Dump Baghouse (C25)
3	Regrinder	Regrind Baghouse (C26)
4	Wood Dryer #1	Entek Dryer #1 Baghouse (C15)
4	Wood Dryer #2	Entek Dryer #2 Baghouse (C16)
4	Noltec Dryer	Noltec Dryer Baghouse #2 (BH2)
5	Finishing Line #1	Line #10 Molder Baghouse (C12)
5	Finishing Line #2	Line #11 Molder Baghouse (C13)
5	Finishing Line #4	Line #12 Molder Baghouse (C21)
5	Entek Dust Collector	Molder Baghouse (C29)
6	HDPE Storage Silo #4	HDPE Silo Bin Vent #1 (C7)
6	Dry Wood Day Bin #1	Dry Wood Day Bin Filter #1 (C23)
6	Dry Wood Day Bin #2	Dry Wood Day Bin Filter #2 (C24)
6	Wet Wood Silo Bin	Wet Wood Silo Bin Vent (C30)

[8/3/2016]

2. Facility-Wide Conditions

Fugitive Emissions

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

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the

complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 Visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by EPA Reference Method 22 (as described in 40 CFR 60), the appendix, or DEQ approved alternative method. **[SIP Condition]**
- 2.9 Except for sources with visible emissions inspection frequency specified elsewhere in the permit, the permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[8/3/2016]

Open Burning

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

Reports and Certifications

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

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706
Phone: (208) 373-0550
Fax: (208)373-0287

Obligation to Comply

- 2.12 Receiving a PTC shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

[8/3/2016]

Fuel-burning Equipment

- 2.13 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

Sulfur Content

- 2.14 The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
- ASTM Grade 1 fuel oil - 0.3% by weight.
 - ASTM Grade 2 fuel oil - 0.5% by weight.
 - ASTM Grades 4, 5 and 6 fuel oil – 1.75% by weight.
- 2.15 The permittee shall not sell, distribute, use, or make available for use, any coal containing greater than 1% sulfur by weight.
- 2.16 The permittee shall maintain documentation of supplier verification of distillate fuel oil/coal content on an as-received basis.

3. Wood Handling System and Truck Dump Operation

3.1 Process Description

The wood handling system is designed to operate with various types of wood fiber, including end trim blocks. The wood waste enters the process via a truck dump hopper. From the hopper, this material passes over a combination of rolls and scalping screen designed to sort material by weight and size. The trim blocks that are separated out are conveyor-fed to a trim end hog that busts up the blocks and reintroduces the wood fiber back into the wood handling system. Wood is fed into the primary hammermill, which further reduces it in size and then delivers it into a 120,000 cubic foot storage silo, or the fines are directed to a second wet wood storage silo. The primary hammermill is controlled by a Donaldson baghouse. The moisture content of the wet wood waste is around 7 to 10% by weight. Emissions from the secondary hammermill are controlled by a Big Mac baghouse. Additionally, wood flour (finely ground wood) received from trucks is stored in a storage silo controlled by a Noltec storage silo baghouse to control PM₁₀ emissions. This description is for informational purposes only.

3.2 Emission Control Description

Particulate matter is the only air pollutant emitted from the wood handling system. Particulate matter emissions from each emissions source are vented to dedicated baghouses. The baghouse stacks or vents are the emissions points. Table 3.1 lists the emissions sources, the emissions points, and the unique emissions point unit identification numbers associated with the wood handling system.

Table 3.1 WOOD HANDLING SYSTEM EMISSIONS SOURCES, EMISSIONS CONTROL AND EMISSIONS POINTS

Emissions Sources	Emissions Control	Emissions Point
Storage Silo	Noltec Storage Silo Baghouse	C1A
Primary Hammermill	Donaldson Baghouse	C3
Trim End Hog	10 RA Baghouse	C17
Wood Storage Silo	8 RA Baghouse	C18
Secondary Hammermill	Big Mac Baghouse	C22
Truck Dump Operation	Truck Dump Baghouse	C25
Regrinder	Regrind Baghouse	C26

Emissions Limits

3.3 Emissions Limits

The PM₁₀ emissions from the wood handling system baghouse stacks and the truck dump baghouse stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 WOOD HANDLING SYSTEM BAGHOUSE EMISSIONS LIMITS*

Source Description	PM ₁₀	
	lb/hr	T/yr
Noltec Storage Silo Baghouse (C1A)	0.014	0.06
Donaldson Baghouse (C3)	0.28	1.22
10 RA Baghouse (C17)	0.87	3.80
8 RA Baghouse (C18)	0.39	1.73
Big Mac Baghouse (C22)	0.48	2.09
Regrind Baghouse (C26)	0.083	0.37
Truck Dump Baghouse (C25)	0.79	3.46

*The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

[8/3/2016, SIP Condition]

3.4 Grain Loading Limits

The PM₁₀ emissions from the wood handling system baghouse stacks shall not exceed 0.005 grains per dry standard cubic foot (gr/dscf).

The PM₁₀ emissions from the regrind baghouse stack shall not exceed 0.0025 grains per dry standard cubic foot (gr/dscf).

The PM₁₀ emissions from the truck dump baghouse stack shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf).

Operating Requirements

- 3.5 The permittee shall install and operate baghouses/cartridge filter systems to control PM and PM₁₀ emissions from the wood handling system and truck dump operation as specified in Table 3.1.

[8/3/2016]

3.6 Baghouse Procedures

Within 60 days of the permit issuance, the permittee shall have developed a Baghouse Procedures document(s) for the inspection and operation of the baghouses/filter systems which control emissions from the wood handling system and truck dump operation as specified in Table 3.1. The Baghouse Procedures document(s) shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse Procedures document(s) shall describe the procedures that will be followed to comply with General Provision 8.2 and shall contain requirements for weekly see-no-see visible emissions inspections of each baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse Procedures document(s) shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from a baghouse at anytime. At a minimum the document shall include, for each baghouse:

- procedures to determine if bags or cartridges are ruptured; and
- procedures to determine if bags or cartridges are not appropriately secured in place.

The Permittee shall maintain records of the results of each Baghouse inspection in accordance with General Provision 8.10. The records shall include , but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse Procedures document(s) shall be submitted to DEQ within 60 days of permit issuance and shall contain a certification by a responsible official. Any changes to the Baghouse Procedures document(s) shall be submitted within 15 days of the change.

The Baghouse Procedures document(s) shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring and recordkeeping requirements specified in the Baghouse Procedures document(s) are incorporated by reference to this permit and are enforceable permit conditions.

[8/3/2016, SIP Condition]

4. Wood Dryers

4.1 Process Description

Three natural gas-fired dryers are used to reduce the moisture content of the wood waste to meet product specifications. The moisture content of the wood waste entering the dryers is typically around 7 to 10% by weight. This material is dried to a moisture content of less than 2% by weight. Each wood dryer is rated at 5.0 MMBtu/hr or less when fired on natural gas. Once dried, the wood material is removed from the dryers by a blower system and is collected in two dedicated baghouses. The dried wood material drops out of the baghouses through rotary air locks and is pneumatically conveyed to dry wood storage bins sized for only one blending batch. This description is for informational purposes only.

4.2 Emissions Control Description

Table 4.1 lists the emissions sources, the air pollution control devices, the unique air pollution control device unit identification numbers associated with the wood dryers.

Table 4.1 WOOD DRYER EMISSIONS SOURCES, EMISSIONS POINTS, AND UNIT ID

Emissions Source	Control Device	Control Device Unit ID	Emissions Point ID
Wood Dryer #1	Entek Dryer #1 Baghouse	C15	C15
Wood Dryer #2	Entek Dryer #2 Baghouse	C16	C16
Noltec Dryer	Noltec Dryer Baghouse #2	BH2	BH2

Emissions Limits

4.3 Emissions Limits

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

**Table 4.2 WOOD DRYER BAGHOUSE NOS. 1 AND 2
EMISSIONS LIMITS***

Source Description	PM ₁₀	
	lb/hr	T/yr
Entek Dryer #1 Baghouse (C15)	0.39	1.73
Entek Dryer #2 Baghouse (C16)	0.39	1.73
Noltec Dryer Baghouse #2 (BH2)	0.04	0.18

*The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

4.4 Grain Loading Limits

The PM₁₀ emissions from the Entek Dryer #1 Baghouse stack and the Entek Dryer #2 Baghouse stack shall not exceed 0.005 grains per dry standard cubic foot (gr/dscf).

The PM₁₀ emissions from the Noltec Dryer Baghouse #2 stack shall not exceed 0.0025 grains per dry standard cubic foot (gr/dscf).

Operating Requirements

4.5 The permittee shall install and operate baghouses/cartridge filter systems to control PM and PM₁₀ emissions from Wood Dryer #1, Wood Dryer #2, and Noltec Dryer as specified in Table 4.1.

[8/3/2016]

4.6 Baghouse Procedures

Within 60 days of the permit issuance, the permittee shall have developed a Baghouse Procedures document(s) for the inspection and operation of the baghouses/filter systems which control emissions from Wood dryer #1, Wood dryer #2, and Noltec Dryer as specified in Table 4.1. The Baghouse Procedures document(s) shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse Procedures document(s) shall describe the procedures that will be followed to comply with General Provision 8.2 and shall contain requirements for weekly see-no-see visible emissions inspections of each baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse Procedures document(s) shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from a baghouse at any time. At a minimum the document shall include, for each baghouse:

- procedures to determine if bags or cartridges are ruptured; and
- procedures to determine if bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of each Baghouse inspection in accordance with General Provision 8.10. The records shall include , but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse Procedures document(s) shall be submitted to DEQ within 60 days of permit issuance and shall contain a certification by a responsible official. Any changes to the Baghouse Procedures document(s) shall be submitted within 15 days of the change.

The Baghouse Procedures document(s) shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring and recordkeeping requirements specified in the Baghouse Procedures document(s) are incorporated by reference to this permit and are enforceable permit conditions.

[8/3/2016]

5. Finishing Line System

5.1 Process Description

Finished boards are conveyed directly from the extruders into three combination molders. There are three in-line systems, each consisting of a heavy duty, six spindle molder configured with a bottom, top, bottom, top, side, side, configuration and a minimum of 25 hp motors on the horizontal spindles. These machines feed at a rate of up to 80 feet per minute. The molders are used to cut a variety of openings or channels in the finished boards to meet varying customer demands. After the boards exit the molder, they right angle transfer and are automatically stacked. Once a unit is completely stacked, it is indexed out on a roll case for final banding and wrapping. Finished goods are stored in existing shed structures. This description is for informational purposes only.

[8/3/2016]

5.2 Emissions Control Description

Table 5.1 lists the proposed emissions sources, the emissions points, and the unique emissions point unit identification numbers associated with the finishing line system.

Table 5.1 FINISHING LINE SYSTEM EMISSIONS SOURCES, EMISSIONS POINTS, AND UNIT ID

Emissions Source	Emissions Point	Emission Point Unit ID
Finishing Line #1	Line #10 Molder Baghouse	C12
Finishing Line #2	Line #11 Molder Baghouse	C13
Finishing Line #4	Line #12 Molder Baghouse	C21
Entek Dust Collector	Entek Dust Collector Baghouse	C29

[8/3/2016]

Emissions Limits

5.3 Emissions Limits

The PM₁₀ emissions from the Finishing Line System baghouse stacks shall not exceed any corresponding emissions rate limits listed in Table 5.2.

Table 5.2 FINISHING LINE SYSTEM EMISSIONS RATE LIMITS*

Source Description	PM ₁₀	
	lb/hr	T/yr
Line #10 Molder Baghouse (C12)	0.26	1.13
Line #11 Molder Baghouse (C13)	0.27	1.19
Line #12 Molder Baghouse (C21)	0.25	1.10
Entek Dust Collector Baghouse (C29)	0.24	1.07

*The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

[8/3/2016]

5.4 Grain Loading Limits

The PM₁₀ emissions from the Line #10 molder baghouse stack, Line #11 molder baghouse stack, and Line #12 molder baghouse stack shall not exceed 0.005 grains per dry standard cubic foot (gr/dscf).

The PM₁₀ emissions from the Entek Dust Collector Baghouse stack shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf).

[8/3/2016]

Operating Requirements

5.5 The permittee shall install and operate baghouses/cartridge filter systems to control PM and PM₁₀ emissions from emissions sources as specified in Table 5.1.

[8/3/2016]

5.6 Baghouse Procedures

Within 60 days of the permit issuance, the permittee shall have developed a Baghouse Procedures document(s) for the inspection and operation of the baghouses/filter systems which control emissions from emissions sources as specified in Table 5.1. The Baghouse Procedures document(s) shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse Procedures document(s) shall describe the procedures that will be followed to comply with General Provision 8.2 and shall contain requirements for weekly see-no-see visible emissions inspections of each baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse Procedures document(s) shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from a baghouse at any time. At a minimum the document shall include, for each baghouse:

- procedures to determine if bags or cartridges are ruptured; and
- procedures to determine if bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of each Baghouse inspection in accordance with General Provision 8.10. The records shall include , but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse Procedures document(s) shall be submitted to DEQ within 60 days of permit issuance and shall contain a certification by a responsible official. Any changes to the Baghouse Procedures document(s) shall be submitted within 15 days of the change.

The Baghouse Procedures document(s) shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring and recordkeeping requirements specified in the Baghouse Procedures document(s) are incorporated by reference to this permit and are enforceable permit conditions.

[8/3/2016]

5.7 Reasonable Control of Fugitive Emissions

The permittee shall reasonably control fugitive emissions resulting from the operation of the Finishing Line System as required by Permit Condition 2.1.

6. HDPE Storage Silo, Dry Wood Day Bins, and Wet Wood Silo Bins

6.1 Process Description

The HDPE storage silo is used to store HDPE resin. The HDPE resin is pneumatically transferred from a delivery truck to the storage silo. Particulate matter emissions resulting from loading will be controlled by a bin vent. The bin vent is a passive air pollution control device.

The dry wood day bins store processed dry wood to be used in the extrusion process. Particulate matter emissions resulting from loading will be controlled by bin filters. The wet wood silos store fines. The moisture content of the wet wood waste is around 7 to 10% by weight. Emissions from both of the wet wood silos are exhausted to the wet wood silo bin vent. This description is for informational purposes only.

6.2 Emissions Control Description

Table 6.1 lists the emissions source, the emissions point, and the unique emissions point unit identification number associated with the HDPE storage silo, the dry wood day bins, and the wet wood silo bins.

Table 6.1 HDPE STORAGE SILO EMISSIONS SOURCES, EMISSIONS POINTS, AND UNIT ID

Emissions Source	Emissions Point	Emission Point Unit ID
HDPE storage silo #4	HDPE Silo Bin vent #1	C7
Dry Wood Day Bin #1	Dry Wood Day Bin filter #1	C23
Dry Wood Day Bin #2	Dry Wood Day Bin filter #2	C24
Wet Wood Silo Bin	Wet Wood Silo Bin Vent	C30

Emissions Limits

6.3 Emissions Limits

The PM₁₀ emissions from the HDPE Silo Bin Vent #1 stack, Dry Wood Day Bin Filter #1 stack, and Dry Wood Day Bin Filter #2 stack shall not exceed any corresponding emissions rate limits listed in Table 6.2.

**Table 6.2 HDPE SILO BIN VENT NO. 1
AND DRY WOOD DAY BIN FILTER NOS. 1 AND 2
EMISSIONS RATE LIMITS***

Source Description	PM ₁₀	
	lb/hr	T/yr
HDPE Silo Bin Vent #1 (C7)	0.034	0.150
Dry Wood Day Bin Filter #1 (C23)	0.020	0.086
Dry Wood Day Bin Filter #2 (C24)	0.020	0.086
Wet Wood Silo Bin Vent (C30)	0.21	0.92

*The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

6.4 Grain Loading Limits

The PM₁₀ emissions from the HDPE Silo Bin Vent #1 stack, Dry Wood Day Bin Filter #1 stack, and Dry Wood Day Bin Filter #2 stack shall not exceed 0.0025 grains per dry standard cubic foot (gr/dscf).

The PM₁₀ emissions from the Wet Wood Silo Bin Vent stack shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf).

Monitoring and Recordkeeping Requirements

6.5 Operations and Maintenance Manual Requirements

The permittee shall have developed an O&M manual for the HDPE Silo Bin Vent #1, Dry Wood Day Bin Filter #1, Dry Wood Day Bin Filter #2, and Wet Wood Silo Bin Vent which describes the procedures that will be followed to comply with General Provision 8.2 and the manufacturer specifications for the bin vent and filters. This manual shall be submitted to DEQ once developed and also remain onsite at all times and shall be made available to DEQ representatives upon request.

7. Summary of Emission Rate Limits

Table 7.1 provides a summary of all emission rate limits required by this permit.

Table 7.1 SUMMARY OF EMISSION RATE LIMITS

Emissions Point	Hourly PM ₁₀ Emissions (lb/hr)	Annual PM ₁₀ Emissions (T/yr) ^a
Noltec Dryer Baghouse #2 (BH2)	0.04	0.18
Noltec Storage Silo Baghouse (C1A) ^b	0.014	0.06
Donaldson Baghouse (C3) ^{b, c}	0.279	1.22
HDPE Silo Bin Vent #1 (C7) ^c	0.034	0.15
Line #10 Molder Baghouse (C12)	0.26	1.13
Line #11 Molder Baghouse (C13)	0.27	1.19
Entek Dryer #1 Baghouse (C15)	0.40	1.73
Entek Dryer #2 Baghouse (C16)	0.40	1.73
10 RA Baghouse (C17)	0.87	3.80
8 RA Baghouse (C18)	0.39	1.73
Line #12 Molder Baghouse (C21)	0.25	1.10
Big Mac Baghouse (C22)	0.48	2.09
Dry Wood Day Bin Filter #1 (C23)	0.02	0.09
Dry Wood Day Bin Filter #2 (C24)	0.02	0.09
Truck Dump Baghouse (C25)	0.79	3.46
Regrind Baghouse (C26) ^{b, d}	0.083	0.37
Entek Dust Collector Baghouse (C29)	0.24	1.07
Wet Wood Silo Bin Vent (C30)	0.21	0.92
Total	6.03	26.42

a. Assumes 8,760 hr/yr operations.

b. From Tier II Operating Permit No. 001-00115, Appendix, which is part of the Idaho SIP

c. These emissions have decreased as compared to Tier II Operating Permit No. 001-00115, Appendix because the all of the conversion project sources (with the exception of the Donaldson Baghouse) are no longer operational and therefore, have no emissions. Originally this portion of the Appendix had emissions limits of 0.6 lb/hr and 2.62 T/yr as compared to now at 0.279 lb/hr and 1.22 T/yr. Totals for the point source emissions in the Tier II Operating Permit No. 001-00115, Appendix were 0.704 lb/hr and 3.07 T/yr. The totals for these sources are now 0.383 lb/hr and 1.67 T/yr.

d. The emission limits for the Grinder Baghouse (BH1) in Tier II Operating Permit No. 001-00115 have been applied to the Regrind Baghouse (C26).

e. Listed in Tier II Operating Permit No. 001-00115 Technical Analysis, but not in the permit.

[8/3/2016, SIP Condition]

8. General Provisions

General Compliance

8.1 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, 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.]

8.2 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]

8.3 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

8.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 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

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

[IDAPA 58.01.01.211.02, 5/1/94]

8.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- 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; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 8.7 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.
- 8.8 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.
- 8.9 Within 60 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 and 4/11/15]

Monitoring and Recordkeeping

- 8.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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, 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

- 8.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.
[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 8.12 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

- 8.13 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

- 8.14 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

- 8.15 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

- 8.16 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 58.01.01.211, 5/1/94]