Air Quality PERMIT TO CONSTRUCT State of Idaho Department of Environmental Quality	PERMIT NUMBER	CLASS	SIC
	P-2010.0042	A	2493
	FACILITY ID	AQCR	NAICS
	055-00018	62	321219
	UTM ZONE	UTM COORDINATES (km)	
	11	506.7 Easting	5283.5 Northing

PERMITTEE			
Plummer Forest Products, Inc. – Post Falls			
PROJECT			
PROJECT No. 60912 PTC Revision			
MAILING ADDRESS	**CITY**	**STATE**	**ZIP**
401 N. Potlatch Road	Post Falls	ID	83877
FACILITY CONTACT	**TITLE**	**TELEPHONE**	
Jeff Carlson	Safety and Environmental Coordinator	(208) 773-7521	
RESPONSIBLE OFFICIAL	**TITLE**	**TELEPHONE**	
Todd Brinkmeyer	President	(208) 773-7521	
EXACT PLANT LOCATION		**COUNTY**	
401 North Potlatch Road, Post Falls, Idaho		Kootenai	

GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Particleboard Manufacturing

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.

	DATE ISSUED	PROPOSED
ERIC CLARK, PERMIT WRITER		
MIKE SIMON, STATIONARY SOURCE MANAGER		

PERMIT TO CONSTRUCT SCOPE

Purpose

1. This is a revised permit to construct which replaces pressure drop MRR requirements with a baghouse procedures document permit condition. It also includes see-no-see visible emissions requirements. Other changes to the permit include the updating of Tables 1.1 and 2.1 to reflect changes in equipment designation/usage.

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.

3. This PTC replaces Permit to Construct No. P-2010.0042, issued on April 22, 2010.

4. The emission sources regulated by this permit are listed in the following table.

Table 1 REGULATED SOURCES

Source Descriptions	Emission Controls
Drag Chain and Drag Chain Baghouse BH-1	None
Rotex Screens #1, #2; Hammermills, Hammermill Cyclone and Baghouse BH-2	None
Outside Dry Silo	Outside Silo High Pressure Air System Baghouse BH-4
Blender, Former and Scalper Air System Baghouse BH-5	None
Board Cooler; Process Fugitives, Rip and Trim Saws	East Sawline Baghouse BH-9 West Sawline Baghouse BH-10
Board Trim and Reclaim Baghouse BH-3	None
Sanderdust Storage Silo	Sanderdust Storage Silo Baghouse BH-6
Sander Air System Baghouse BH-7	None
Sanderdust Overs Baghouse BH-8	None
Boiler	Electrostatic Precipitator
Particle Dryer	Multiclone
Press	None

[Proposed]

PARTICLEBOARD MANUFACTURING

Process Description

5. The facility processes wood shavings into particleboard by milling wood shavings into an acceptable size, drying to acceptable moisture content, mixing the milled shavings with resin, and pressing the milled shavings and resin mixture into particleboard.

6. Emission Controls Description

Emissions from the Outside Dry Silo are controlled by the Outside Silo High Pressure Air System Baghouse. Emissions from the Sanderdust Storage Silo are controlled by the Sanderdust Storage Silo Baghouse. Emissions from the sawline are controlled by the East and West Sawline Baghouses, which vent through a common stack. Emissions from the boiler are controlled by an electrostatic precipitator (ESP) and emissions from the Particle Dryer are controlled by the multiclone. The Press Vents do not have emissions controls.

Table 2 PARTICLEBOARD MANUFACTURING DESCRIPTION

Emissions Units / Processes	Emission Control Devices	Emission Points
Drag Chain and Drag Chain Baghouse BH-1	None	Drag Chain Baghouse Stack
Rotex Screens #1, #2; Hammermills, Hammermill Cyclone and Baghouse BH-2	None	Hammermill Baghouse Vent
Outside Dry Silo	Outside Silo High Pressure Air System Baghouse BH-4	Scalper Baghouse Vent
Blender, Former and Scalper Air System Baghouse BH-5	None	Scalper Baghouse Stack
Board Cooler; Process Fugitives, Rip and Trim Saws	East Sawline Baghouse BH-9 West Sawline Baghouse BH-10	East/West Sawline Baghouse' Stack
Board Trim and Reclaim Baghouse BH-3	None	Hammermill Baghouse/Reclaim Baghouse Stack
Sanderdust Storage Silo	Sanderdust Storage Silo Baghouse BH-6	Sanderdust Storage Silo Baghouse Vent
Sander Air System Baghouse BH-7	None	Sanderdust Air System Baghouse Vent
Sanderdust Overs Baghouse BH-8	None	Sanderdust Overs Baghouse Vent
Boiler	Electrostatic Precipitator	Electrostatic Precipitator Stack
Particle Dryer	Multiclone	Particle Dryer Multiclone Stack
Press	None	North, East and West Press Vents

[Proposed]

Emission Limits

7. Facility-Wide HAPs Emission Limits

- Facility-wide HAP emissions shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.
- Facility-wide HAP emissions shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.

[Proposed]

8. Opacity Limit

Emissions from the any stack, vent, or functionally equivalent opening associated with the particleboard press, 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.

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Operating Requirements

9. Pressure Relief Valve Operation

The boiler steam shall not be superheated and the maximum pressure shall be limited to 300 psi absolute, by means of a pressure relief valve which bears the "Valve Repair (VR) Stamp" of a certified valve repair company that is recognized by the loss prevention insurance carrier. The stamp on the pressure relief valve and the associated documentation shall be maintained on site and made available for review by DEQ representatives upon request.

[January 10, 1974]

Modification Potential Requirements

10. HAP Emissions Potential Increase

Should there be a physical change or change in method of operation of any stationary source which results in an emission increase or which results in the emission of any regulated air pollutant not previously emitted a PTC modification application or an exemption determination small be submitted to DEQ.

[Proposed]

Monitoring and Recordkeeping Requirements

11. Furnish Usage Records

For the particleboard process, the permittee shall monitor and record monthly the furnish usage of the process. The furnish usage records shall remain on site for the most recent two year period and shall be made available to DEQ representatives upon request.

12. HAPs Monitoring Requirements

The permittee shall monitor and record the monthly and annual HAP emissions from the press vents and East & West Sawline baghouses using the emission factors and furnish usage records required by previous performance testing results and the Furnish Usage Permit Condition, respectively, to demonstrate compliance with the Facility-Wide HAPs Emission Limit Permit Condition. The permittee shall monitor and record the monthly and annual HAP emissions from the sander air system, particle dryer, and boiler using the furnish usage records required by Permit Condition 11 to demonstrate compliance with the Facility-Wide HAPs Emission Limit Permit Condition. Annual facility-wide HAP emissions, expressed in tons per year (TPY), shall be determined by summing monthly HAP emissions over the previous consecutive 12-month period. 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.

13. Control System Procedures

Within 60 days of permit issuance, the permittee shall have developed a Control System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from the baghouses, transfer point boots/enclosures, and potential transfer point water sprays. The Control System Procedures document 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 Control System Procedures document shall describe the procedures that will be followed to comply with the maintenance General Provision and shall contain requirements for weekly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

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

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.
- Air to Cloth Ratio Certification

The Control System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the material transfer points at any time. At a minimum the document shall include:

- Procedures to determine if the spray bar is functioning properly; and
- Procedures to determine if the water spray bar is appropriate for the application and secured in place.

The Control System Procedures document shall also include, at a minimum, the following methodology used by the facility to handle fugitive dust emissions:

- Use, where practical, of water, or chemical dust suppressant, for control of dust generated as a result of material handling or processing;
- Application of water, or chemical dust suppressant, by hardpiped, conical deluge, or mist, application systems, or equivalent;
- Application and use, where practical and as specified in the application materials, of shrouding of material transfer points;
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Containment methods shall be employed during mixing or drop operations;

The permittee shall maintain records of the results of each control system inspections in accordance with the Recordkeeping General Provision. The records shall include a description of whether visible emissions were present and if visible emissions were present, a description of the corrective action that was taken.

The Control System Procedures document shall be submitted to DEQ within 60 days of permit issuance to remain on file and shall contain a certification by a responsible official. A copy shall also remain on site. Any permittee or DEQ requested changes to the Control System Procedures document shall be submitted within 15 days of the change.

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, Idaho 83814

The Control System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the Control System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[Proposed]

PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

14. 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.]

15. 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]

16. 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

17. 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 or 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

18. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:

- 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.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

19. 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, at its option, may 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.

20. 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.

21. 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

22. 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

23. 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

24. 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

25. 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

26. 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

27. 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

28. 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]