

Statement of Basis

**Permit to Construct P-2010.0042
Project No. 60912**

**Plummer Forest Products, Inc.
Post Falls, Idaho**

Facility ID No. 055-00018

Proposed Public Comment Draft

**October 27, 2011
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Permit Writer**

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

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

| | |
|-----------------|--|
| AAC | acceptable ambient concentrations |
| AACC | acceptable ambient concentrations for carcinogens |
| acfm | actual cubic feet per minute |
| AFS | AIRS Facility Subsystem |
| AIRS | Aerometric Information Retrieval System |
| AQCR | Air Quality Control Region |
| ASTM | American Society for Testing and Materials |
| BACT | Best Available Control Technology |
| BMP | best management practices |
| Btu | British thermal units |
| CAA | Clean Air Act |
| CAM | Compliance Assurance Monitoring |
| CAS No. | Chemical Abstracts Service registry number |
| CBP | concrete batch plant |
| CEMS | continuous emission monitoring systems |
| cfm | cubic feet per minute |
| CFR | Code of Federal Regulations |
| CI | compression ignition |
| CMS | continuous monitoring systems |
| CO | carbon monoxide |
| COMS | continuous opacity monitoring systems |
| DEQ | Department of Environmental Quality |
| dscf | dry standard cubic feet |
| EL | screening emission levels |
| EPA | U.S. Environmental Protection Agency |
| FEC | Facility Emissions Cap |
| gpm | gallons per minute |
| gph | gallons per hour |
| gr | grain (1 lb = 7,000 grains) |
| HAP | hazardous air pollutants |
| HMA | hot mix asphalt |
| hp | horsepower |
| hr/yr | hours per year |
| ICE | internal combustion engines |
| IDAPA | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| km | kilometers |
| lb/hr | pounds per hour |
| lb/qtr | pound per quarter |
| m | meters |
| MACT | Maximum Achievable Control Technology |
| mg/dscm | milligrams per dry standard cubic meter |
| MMBtu | million British thermal units |
| MMscf | million standard cubic feet |
| NAAQS | National Ambient Air Quality Standard |
| NAICS | North American Industry Classification System |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NO ₂ | nitrogen dioxide |
| NO _x | nitrogen oxides |
| NSPS | New Source Performance Standards |
| O&M | operation and maintenance |

| | |
|-------------------|--|
| PAH | polyaromatic hydrocarbons |
| PC | permit condition |
| PCB | polychlorinated biphenyl |
| PERF | Portable Equipment Relocation Form |
| PM | particulate matter |
| PM ₁₀ | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers |
| POM | polycyclic organic matter |
| ppm | parts per million |
| PSD | Prevention of Significant Deterioration |
| PTC | permit to construct |
| PTC/T2 | permit to construct and Tier II operating permit |
| PTE | potential to emit |
| RAP | recycled asphalt pavement |
| RFO | reprocessed fuel oil |
| Rules | Rules for the Control of Air Pollution in Idaho |
| scf | standard cubic feet |
| SCL | significant contribution limits |
| SIC | Standard Industrial Classification |
| SIP | State Implementation Plan |
| SM | synthetic minor |
| SM80 | synthetic minor facility with emissions greater than or equal to 80% of a major source threshold |
| SO ₂ | sulfur dioxide |
| SO _x | sulfur oxides |
| T/yr | tons per consecutive 12-calendar month period |
| T2 | Tier II operating permit |
| TAP | toxic air pollutants |
| TEQ | toxicity equivalent |
| T-RACT | Toxic Air Pollutant Reasonably Available Control Technology |
| U.S.C. | United States Code |
| UTM | Universal Transverse Mercator |
| VOC | volatile organic compounds |
| yd ³ | cubic yards |
| µg/m ³ | micrograms per cubic meter |

FACILITY INFORMATION

Description

Plummer Forest Products, Inc., Post Fall's facility manufactures particleboard from wood shavings and resin. Trucks deliver and dump wood shavings in one of two storage buildings. A drag chain feeds the wood shaving to milling machines, which process the wood shavings into furnish. The furnish is dried in a rotary dryer and temporarily stored in the outside dry silo. Furnish from the outside dry silo and sanderdust is then passed through a weigh system to either the #1 small blender and main blender, or the #2 small blender. In the blenders, resin is mixed with the sanderdust and furnish. The mix is conveyed to a former where the mix takes the shape of a mat approximately the size of a 4' X 8' particleboard panel. The mats are pressed by the particleboard press, allowed to cool, cut to size, and sanded. Scrap from the saw line is processed back into furnish. Sanderdust generated by the process is stored, used for the manufacturing process or as fuel for the facility's Kipper and Sons boiler, or sold. The Kipper and Sons boiler provides steam heat for the process and plant make-up air.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

| | |
|--------------------|---|
| April 22, 2010 | P-2010.0042, Ownership Change, Permit status (A, but will become S upon issuance of this permit) |
| September 23, 2005 | P-050104, Installing equipment to recover sanderdust and establishing federally enforceable HAP limits to be an HAP area source, Permit Status (S). |
| August 17, 2001 | P-010101 (055-00018), Installation of press cure monitor, rotary particle dryer replacement, and production increase, Permit Status (S). Included as part of the May 22, 2001 PTC |
| May 22, 2001 | P-000115 (055-000018), PTC for installation of press cure monitor and production increase, Permit Status (S). |
| February 1, 1985 | 0860-0018, PTC for installing wood chip pre-dryer and associated equipment., Permit Status (S). According to the information in the technical memorandum for the initial Tier I issued on 8/28/02, the equipment was never installed. |
| November 25, 1980 | PTC Letter, PTC for installation of a wood dryer, Permit Status (S). According to the information in the technical memorandum for the initial Tier I issued on 8/28/02, the equipment was never installed. |
| January 10, 1974 | PTC Letter, Initial PTC for constructing the facility, Permit Status (A). |

Application Scope

This PTC is for a revision at an existing Tier I facility. See the current Tier I permit statement of basis for the permitting history.

The applicant has proposed to:

- Revise language of Tables 1.1 and 2.1, now Tables 1 and 2.
- Remove pressure drop monitoring and recordkeeping requirements.

Performance Testing schedules have been updated and the pressure drop requirements has been replaced with a baghouse Maintenance Procedures document permit condition. This document is to be submitted to DEQ for approval outlining how all control equipment will be operated and maintained. Visible emission inspections are also included.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625

Visible Emissions

The sources of PM₁₀ emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 8.

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

IDAPA 58.01.01.301

Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for VOC or as demonstrated previously in the Emissions Inventories Section of an analysis, September 23, 2005. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52.21(b)(1). Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements. Note that both 40 CFR 60, Subpart Dc discussion is described in detail in the Statement of Basis of the T1 Operating Permit, T1-2011.0115

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

The facility has proposed to operate as a minor source of hazardous air pollutant (HAP) emissions, and is not subject to the requirements of 40 CFR 63, Subpart DDDD–National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.

40 CFR 63, Subpart DDDD

**National Emission Standards for Hazardous Air Pollutants:
Plywood and Composite Wood Products**

§ 63.2230

What is the purpose of this subpart?

This subpart establishes national compliance options, operating requirements, and work practice requirements for hazardous air pollutants (HAP) emitted from plywood and composite wood products (PCWP) manufacturing facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the compliance options, operating requirements, and work practice requirements.

This subpart applies to you if you meet the criteria in paragraphs (a) and (b) of this section.

(a) You own or operate a PCWP manufacturing facility. A PCWP manufacturing facility is a facility that manufactures plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product. Plywood and composite wood products manufacturing facilities also include facilities that manufacture dry veneer and lumber kilns located at any facility. Plywood and composite wood products include, but are not limited to, plywood, veneer, particleboard, oriented strandboard, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.

(b) The PCWP manufacturing facility is located at a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (10 tons) or more per year or any combination of HAP at a rate of 22.68 megagrams (25 tons) or more per year.

Plummer Forest Products, Inc. is not a major source for HAPs as the facility is limited to less than 10 and 25 T/yr. Therefore, they are not applicable to the Subpart.

Note that both 40 CFR 63, Subparts ZZZZ and JJJJJ discussions are described in detail in the Statement of Basis of the T1 Operating Permit, T1-2011.0115.

Permit Conditions Review

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

Existing Permit Condition 1.3

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

Table Error! No text of specified style in document..1 SUMMARY OF REGULATED SOURCES

| <i>Permit Section</i> | <i>Source Description</i> | <i>Emissions Control(s)</i> |
|-----------------------|---|---|
| 2 | <i>Drag Chain</i> | <i>Drag Chain Baghouse BH-1</i> |
| 2 | <i>Rotex Screens #1, #2; Hammermills</i> | <i>Hammermill Cyclone Baghouse BH-3A</i> |
| 2 | <i>Blender, Former</i> | <i>Scalper Air System Baghouse BH-5, Outside Silo High Pressure Air System Baghouse BH-5A</i> |
| 2 | <i>Board Cooler, Process Fugitives, Rip & Trim Saws</i> | <i>East Sawline Baghouse BH-10A, West Sawline Baghouse BH-10</i> |
| 2 | <i>Board Trim Hog</i> | <i>Reclaim Baghouse BH-3</i> |
| 2 | <i>Sanderdust Storage Silo</i> | <i>Sanderdust Storage Silo Baghouse BH-6</i> |
| 2 | <i>Sander</i> | <i>Sander Air System Baghouse BH-7</i> |
| 2 | <i>Boiler Fuel Overs</i> | <i>Sanderdust Overs Baghouse</i> |
| 2 | <i>Boiler</i> | <i>Electrostatic Precipitator</i> |
| 2 | <i>Particle Dryer</i> | <i>Multiclone</i> |
| 2 | <i>Press</i> | <i>None</i> |

Revised Permit Condition 4

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

Table 2 REGULATED SOURCES

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

The Regulated Sources Table has been updated at the request of the permittee to incorporate the correct emission control devices for the proper emissions unit. Some of the controls have been removed because they were determined to be process equipment.

Existing Permit Condition 2.2

Emissions from the hammermill and Rotex screens are controlled by hammermill cyclone baghouse BH-3A. Emissions from the board trim hog are controlled by reclaim baghouse BH-3. The hammermill cyclone baghouse and reclaim baghouse vent to a single stack, the hammermill baghouse/reclaim baghouse stack. Emissions from the blender and former are controlled by scalper air system baghouse BH-5 and outside silo high pressure air system baghouse BH-5A. Both baghouses vent to through the scalper baghouse stack. Table 2.1 lists the emission units, their emission control device, and their emissions point.

Table Error! No text of specified style in document..3 PARTICLEBOARD MANUFACTURING DESCRIPTION

| Emissions Unit(s) / Process(es) | Emissions Control Device | Emissions Point |
|--|--|---|
| Drag Chain | Drag Chain Baghouse BH-1 | Drag Chain Baghouse Stack |
| Rotex Screens #1, #2; Hammermills | Hammermill Cyclone Baghouse BH-3A | Hammermill Baghouse/ Reclaim Baghouse Stack |
| Blender, Former | Scalper Air System Baghouse BH-5, Outside Silo High Pressure Air System Baghouse BH-5A | Scalper Baghouse Stack |
| Board Cooler, Process Fugitives, Rip & Trim Saws | East Sawline Baghouse BH-10A, West Sawline Baghouse BH-10 | East/West Sawline Baghouses' Stack |
| Board Trim Hog | Reclaim Baghouse BH-3 | Hammermill Baghouse/ Reclaim Baghouse Stack |
| Sanderdust Storage Silo | Sanderdust Storage Silo Baghouse BH-6 | Sanderdust Storage Silo Stack |
| Sander | Sander Air System Baghouse BH-7 | Sander Air System Baghouse |
| Boiler Fuel Overs | Sanderdust Overs Baghouse | Sanderdust Overs Baghouse Tack |
| Boiler | Electrostatic Precipitator | Electrostatic Precipitator Stack |
| Particle Dryer | Multiclone | Particle Dryer Multiclone Stack |
| Press | None | North, East, & West Press Vents |

Revised Permit Condition 6

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 4 PARTICLEBOARD MANUFACTURING DESCRIPTION

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

The table has been updated at the request of the permittee to incorporate the correct emission control devices for the proper emissions unit. Some of the controls have been removed because they were determined to be process equipment.

Existing Permit Condition 2.3

- *By no later than June 30, 2007, facility-wide HAP emissions shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.*
- *By no later than June 30, 2007, facility-wide HAP emissions shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.*

Revised Permit Condition 7

- *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.*

The requirement date has passed and is no longer relevant; therefore it was removed. The facility has been meeting this requirement.

Existing Permit Condition 2.5

The permittee shall conduct a performance test to measure formaldehyde, methanol, and total HAP emissions from the press vents and East & West Sawline baghouses in accordance with the procedures outlined in Table 2.3, or a DEQ-approved alternative method, no later than June 30, 2007. Total hazardous air pollutant emissions means, as defined by 40 CFR 63.2292, the sum of the emissions of the following six compounds: acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde. The performance test shall be used to develop emission factors for formaldehyde, methanol, and total HAP emissions from the press vents and East & West Sawline baghouses in order to demonstrate compliance with the emission rate limit listed in Permit Condition 2.3.

Table 2.3 Performance Test Methods

| Pollutant | Performance Test Method |
|------------------|--|
| Formaldehyde | Method 0011 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA Publication No. SW-846) for formaldehyde; OR the NCASI Method CI/WP-98.01 (IBR, see §63.14(f)); OR the NCASI Method IM/CAN/WP-99.02 (IBR, see § 63.14(f)). |
| Methanol | Method 308 in appendix A to 40 CFR part 63; OR Method 320 in appendix A to 40 CFR part 63; OR the NCASI Method CI/WP-98.01 (IBR, see § 63.14(f)); OR the NCASI Method IM/ CAN/WP-99.02 (IBR, see § 63.14(f)). |
| Total HAP | Method 320 in appendix A to 40 CFR part 63; OR the NCASI Method IM/CAN/WP-99.02 (IBR, see § 63.14(f)); OR ASTM D6348-03 (IBR, see § 63.14(b)) provided that percent R in Annex A5 of ASTM D6348- 03 is equal or greater than 70% and less than or equal to 130%. |

During the performance test, the manufacturing process shall be operated at a minimum of 90% of the maximum furnish usage rate.

Revised Permit Condition 10

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 shall be submitted to DEQ.

The testing requirement was removed because the one-time test was performed and accepted by DEQ. The results of the performance test are now being used as emission factors to establish HAPs emissions from the sawline and press vents. Assuming the current process for these units do not change and create an increase in emissions, the emission factors from the 2007 Performance Team are valid. This new condition reminds/requires PFP that should there be a change in the mode of operation that triggers a modification, PTC application or exemption determination needs to be submitted to DEQ. At which time, updated emission factors and/or performance test requirements will be revisited.

Removed Permit Conditions 2.7, 2.8 and 2.11

The pressure differential across each emission control device listed in Table 2.1, Permit Condition 2.2, shall be maintained within manufacturer and O&M manual recommendations and specifications.

Within 60 days after startup, the permittee shall have developed an O&M manual for the emission control devices listed in Table 2.1, Permit Condition 2.2, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and made available to DEQ representatives upon request.

When operating, the permittee shall monitor and record once per day, the pressure differential across each emission control device listed in Table 2.1, Permit Condition 2.2, to demonstrate compliance with Permit Conditions 2.7 and 2.8.

These conditions were removed at the permittee's request. Pressure drop differential is not necessarily the best method to establish how well the baghouse is operating. In place of pressure differential, a baghouse procedures document will be required (See Permit Condition 13).

New Permit Condition 13

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 the 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 spray bar is functioning properly; and*
- *Procedures to determine if 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 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.

This condition is now standard language throughout the majority of IDEQ permits that include baghouses. Within 60 days of startup, the permittee needs to develop a procedures document outlining operations and maintenance schedules. This procedure must be submitted to the appropriate regional DEQ office for review. This is to demonstrate that all required control equipment is being operated and maintained properly. Also any change whether it is done by the facility or requested by DEQ must be submitted to DEQ within 15 days of the change.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.

APPENDIX A – FACILITY DRAFT COMMENTS

The following comments were received from the facility on October 20, 2011:

Facility Comment #1: Ongoing HAP Source Testing Requirement, PTC Condition 10

The previous PTC Permit Condition 2.5 required the former owners, Potlatch Forest Products Corporation (PFPC), to perform a one-time testing campaign to establish HAPs emissions factors for the press vents and sawline baghouses. The purpose of the required HAP source testing was to establish emission factors for use in determining compliance with facility-wide HAP emission limits.

The required testing was completed on January 16-17, 2007 and was approved by IDEQ on May 18, 2007. Results of the DEQ review of the HAP emission factor development testing are presented in the attached letter from IDEQ to PFPC. PFPC understood at the time of the testing, that the emission factor development testing would only need to be performed once.

The current facility draft PTC permit converts the one-time emissions factor development testing requirement into an on-going compliance testing requirement. PFP requests that the ongoing HAP testing requirement contained in PTC Condition 10 be eliminated.

PFP does expect that the HAP emission factors for the press vents or sawline baghouses will change over time. The primary source of HAP emissions in particleboard manufacture is wood heating and drying, which remains constant. The AP-42 and NCASI emission factors that are in common use throughout the industry have not been updated for years, so there is no reason the think the on-site emission factors need regular updating.

DEQ Response #1: PTC Condition 10 has been modified. DEQ has concluded that the concern of HAP emissions was related to a potential change or increase in HAP emissions associated with a change in operation of the press and sawline. The current emission factors used for demonstrating compliance with the 10 and 25 tpy HAP emission limits are valid under the operating methods used today. Should there be a future change in operation that results in an emission increase, a modification or exemption determination would be triggered in accordance with the State Air Rules. Therefore, the concern of DEQ will be addressed in any future permitting action. Thus, there is no need for future testing at this time. Note that emission factors and potential performance testing may be addressed during the next permitting action where a warranted.

Facility Comment #2: Minor Items on PTC Technical Analysis

PFP asks that references to the ongoing HAP testing on pages 5 and 6 of the PTC technical analysis be updated to reflect that emission factor development testing will not have to be repeated.

The MACT applicability section on page 7 states that the facility is subject to Subpart DDDD, then farther down explains that it is not subject because it is a minor source. PFP requests that the analysis state in the first sentence that the facility is not subject to Subpart DDDD, in case the reader does not read through the whole section.

Pages 10 and 11 explain the transition of the HAPs emission factor development testing to an ongoing compliance testing requirement. PFP requests that this section be reviewed along with Condition 10.

DEQ Response #2: These updates have been made as requested.

APPENDIX B – PROCESSING FEE