



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Curt Fransen, Director

July 8, 2014

Chris Pease, Plant Manager
Idaho Forest Group LLC – Riley Creek–Moyie Springs
P.O. Box 108
Moyie Springs, Idaho 83845

RE: Facility ID No. 021-00001, Idaho Forest Group LLC – Riley Creek–Moyie Springs, Moyie Springs
Final Permit Letter

Dear Mr. Pease:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2012.0034 Project No. 61335 to Idaho Forest Group LLC – Riley Creek–Moyie Springs (IFG) for the conversion of the facility's existing combo Tier II operating permit and permit to construct (T2/PTC) to a stand-alone PTC. 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 on February 28, 2014 and the additional information received on April 2, 2014.

This PTC does not contravene any existing Tier I operating permit conditions, therefore the process or equipment may be operated in accordance with the PTC before the Tier I operating permit is renewed.

This permit is effective immediately and replaces T2/PTC No. P-2012.0034 Project No. 61070, issued on December 5, 2012. This permit does not release IFG 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 Almer Casile, DEQ's Air Quality Compliance Officer, at (208) 769-1422 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 Harbi Elshafei at (208) 373-0501 or harbi.elshafei@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

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

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\HE
Permit No. P-2012.0034 PROJ 61335
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Idaho Forest Group LLC - Riley Creek-Moyie Springs

Permit Number P-2012.0034

Project ID 61335

Facility ID 021-00001

Facility Location 3082 Roosevelt Drive
Moyie Springs, ID 83845

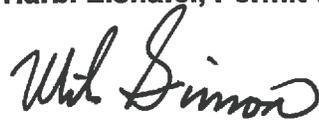
Permit Authority

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 its 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; (g) 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. 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 July 8, 2014



Harbi Elshafei, Permit Writer



Mike Simon, Stationary Source Manager

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1. PERMIT SCOPE

Purpose

- 1.1 The purpose of this permitting action is to convert the Tier II Operating Permit and Permit to Construct (T2 OP/PTC) No. P-2012.0034 Proj No. 61070 to a Stand-Alone PTC. [7/8/2014]
- 1.2 This Permit to Construct (PTC) replaces T2 OP/PTC No. P-2012.0034 Project No. 61070, issued December 5, 2012. [7/8/2014]
- 1.3 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. [7/8/2014]

Regulated Sources

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

Table 1.1 REGULATED SOURCES

Permit Section	Source	Control Equipment
2	Facility-wide Conditions (all affected emissions sources)	NA
3	<u>Hog fuel boiler:</u> Manufacturer: Kipper and Sons Burner type: Stoker-fired unit Maximum capacity: 80,000 pounds steam per hour	<u>Multiclone:</u> Manufacturer: Joy Manufacturing <u>Electrified Filter Bed (EFB):</u> Manufacturer: EFB, Inc. Model No.: FDC 50 particulate control system Maximum flow rate: 50,000 acfm
4	<u>Dry kilns</u> – four total. Kilns Nos. 1-3 were manufactured by Moore; kiln No. 4 was manufactured by Coe.	None
5	<u>Planermills: Stetson planermill:</u> Manufacturer: Stetson; installed in 1989; rate: 1600 ft/min. Shavings generated from the process are pneumatically transferred to a cyclone. A baghouse was added to the planer's cyclone in 1994.	<u>Cyclone:</u> Manufacturer: NA <u>Baghouse:</u> Manufacturer: Donaldson-Day (Torit) Model: 276-RFW-10 Air-to-cloth ratio: 9:1

[8/31/2009]

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 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) 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%, as measured using Method 9, 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 its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emission 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.

Open Burning

- 2.9 The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

Reports and Certifications

- 2.10 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
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

Fuel-burning Equipment

- 2.11 In accordance with IDAPA 58.01.01.676 the permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.200 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[12/5/2012]

Incorporation of Federal Requirements by Reference

- 2.12 Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- Applicable requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart JJJJJ.

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that document.

[7/8/2014]

3. HOG FUEL BOILER

3.1 Process Description

The facility operates a hog fuel-fired boiler. The boiler is manufactured by Kipper and Sons, and is a spreader-stoker with a maximum rated design capacity of 80,000 pounds of steam per hour or 128 MMBtu/hr. The boiler was installed in 1972. The boiler is not subject to New Source Performance Standards (NSPS) because the construction date of the boiler predates all applicable NSPS regulations.

3.2 Control Device Descriptions

Table 3.1 HOG FUEL BOILER

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Hog fuel boiler	High efficiency multiclone and electrified filter bed (EFB). Baghouse – disengagement chamber. Control efficiency (PM ₁₀): 99.8%	EFB primary stack disengagement chamber baghouse stack

[8/31/2009]

Emission Limits

3.3 Emission Limits

- The PM₁₀ and CO emissions from the boiler EFB primary stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.
- The PM₁₀ emissions from the boiler's EFB disengagement chamber stack shall not exceed any corresponding emissions rate limits listed in Table 3.2

Table 3.2 HOG FUEL BOILER EMISSIONS LIMITS¹

Source Description	PM ₁₀ ²		CO
	lb/hr ³	T/yr ⁴	T/yr ⁴
Boiler - EFB primary stack	6.51	28.5	391.0
Boiler – disengagement chamber stack	0.18	0.79	--

- 1) In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and recordkeeping requirements.
- 2) Particulate matter with and aerodynamic diameter less than or equal to a nominal ten (10) micrometers including condensable particulate as defined in IDAPA 58.01.01.006.84.
- 3) Pounds per hour. As determined by source test methods prescribed by IDAPA 58.01.01.157.
- 4) Tons per consecutive 12-calendar month period.

[8/31/2009]

- In accordance with IDAPA 58.01.01.677, the permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.2 gr/dscf of effluent gas corrected to 8% oxygen by volume when burning wood product.

Operating Requirements

- 3.4 The boiler shall not produce more than 391 million pounds of steam per any consecutive 12-month calendar period. [8/31/2009]
- 3.5 The permittee shall install, calibrate, maintain, and operate, in accordance with the O&M manual specifications, equipment to continuously measure the EFB filter bed voltage, EFB filter bed current, and EFB filter bed temperature to control PM and PM₁₀ emissions from the EFB primary stack. [8/31/2009]
- 3.6 The permittee shall install, calibrate, maintain a monitor to continuously measure the steam production rate of the hog fuel boiler. Steam production rate shall be maintained in accordance with General Provisions 7.2 and 7.10. [8/31/2009]
- 3.7 The permittee shall have developed an Operational and Maintenance (O&M) manual that establishes operating ranges for the EFB operating parameters for the control of the PM and PM₁₀ emissions from the boiler primary stack. The O&M manual 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 O&M manual shall describe the procedures that will be followed to comply with General Provision 7.2 of this permit and the manufacturer specifications for the EFB. At a minimum the O&M manual must establish the following: voltage, amperage, and temperature operating ranges for the EFB filter bed including the averaging periods. The O&M manual must also address voltage and amperage monitoring procedures to determine whether the EFB filter bed is operating as designed. In addition the O&M manual must address the temperature filter bed monitoring procedure to determine whether the filter bed temperature is operating as designed. The manual must be updated after each performance test conducted in accordance with Permit Condition 3.12. Each updated manual shall establish ranges with averaging periods for operating parameters consistent with those achieved during the performance test, which demonstrated compliance. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the O&M manual are incorporated by reference to this permit and are enforceable permit conditions.

The O&M manual shall be submitted to DEQ at the following address. Any changes made to the O&M manual shall also be submitted to DEQ within 15 days of the change to the following address:

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

[8/31/2009]

- 3.8 The permittee shall install and operate a baghouse to control PM and PM₁₀ emissions from the EFB disengagement chamber stack.
- 3.9 The permittee shall have developed a baghouse procedures document for the inspection and operation of the baghouse which controls emissions from the EFB disengagement chamber stack. The baghouse 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 baghouse procedures document shall describe the procedures that will be followed to comply with General Provision 7.2 and shall contain requirements for quarterly see-no-see visible emissions inspections of the baghouse. The inspections shall occur during daylight hours and under normal operating conditions.

The baghouse 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 anytime. At a minimum the document shall include:

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

The permittee shall maintain records of the results of each baghouse inspections in accordance with General Provision 7.10. 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.

Any changes to the baghouse procedures document shall be submitted to DEQ within 15 days of the change and shall contain a certification by a responsible official.

The baghouse 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 baghouse procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[7/8/2014]

- 3.10 The operating parameters for voltage, amperes, and filter bed temperature for the EFB shall be maintained within the O&M manual specifications.

[8/31/2009]

Monitoring and Recordkeeping Requirements

- 3.11 The permittee shall conduct a performance test to measure PM and PM₁₀ emissions from the boiler EFB primary stack to demonstrate compliance with the PM gr/dscf and PM₁₀ lb/hr limits. The performance test shall be conducted by December 22, 2014. The performance test shall be conducted under worst case normal conditions as required by IDAPA 58.01.01.157 and General Provisions 7.7 -7.9, and the performance test report shall contain documentation that the test was conducted under these conditions. The permittee is encouraged to submit a source testing protocol for approval 30 days prior to conducting the performance test. The permittee shall monitor and record the following information during the performance testing:

- Visible emissions, using methods and procedures contained in IDAPA 58.01.01.625.
- Steam produced by the boiler in pounds steam per hour.
- EFB filter-bed voltage, current, and temperature; and the EFB ionizer voltage and current.

[12/5/2012]

- 3.12 The permittee shall monitor and record the boiler's steam production monthly and annually to demonstrate compliance with Permit Condition 3.4. Steam production shall be compiled using units of pounds steam per hour. Annual boiler steam production shall be determined by summing monthly steam production rates over the previous consecutive 12-calendar months period. This information shall be maintained in accordance with General Provision 7.10.

[8/31/2009]

3.13 The permittee shall monitor and record continuously the EFB ionizer voltage and amperage; and the EFB filter-bed voltage, current, and temperature while the EFB is operating. This information shall be maintained in accordance with the General Provisions.

3.14 The permittee shall maintain records of the results of the continuous EFB ionizer voltage and current; and EFB filter-bed temperature, voltage, and current, in accordance with the General Provisions.

[8/31/2009]

3.15 The permittee shall monitor and record the visible emissions in accordance with Permit Condition 2.8.

[8/31/2009]

Reporting Requirements

3.16 The permittee shall report the results of the performance tests required in Permit Condition 3.12 to DEQ in a written report to be received no later than 30 days after completion of the test unless a different time period is approved in writing by DEQ. If additional performance testing is conducted, it shall be conducted in accordance with Permit Condition 3.12, and the permittee shall report the results to DEQ in a written report to be received no later than 30 days after completion of the test unless a different time period is approved in writing by DEQ.

[8/31/2009]

40 CFR 63 Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

3.17 The permittee shall comply with all applicable provisions of 40 CFR 63 Subpart JJJJJJ.

[7/8/2014]

4. DRY KILNS – FOUR TOTAL

4.1 Process Description

The facility consists of four dry kilns used to dry green lumber. The kilns were manufactured by Moore and Coe. The dry kilns are heated using steam supplied by the facility’s wood-fired boiler.

4.2 Emission Control Description

Table 4.1 DRY KILNS – FOUR TOTAL

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Dry kilns – four total	Uncontrolled	Dry kiln vents

[8/31/2009]

Emission Limits

4.3 Emissions Limits

- The combined PM₁₀ emissions from the four dry kiln vents shall not exceed any corresponding emissions rate limits listed in Table 4.2.

[8/31/2009]

- The combined VOC emissions from the four dry kiln vents shall not exceed any corresponding emissions rate limits listed in Table 4.2.

[8/31/2009]

Table 4.2 DRY KILNS – FOUR TOTAL EMISSIONS LIMITS¹

Source Description	PM ₁₀ ²		VOC
	lb/day ³	T/yr ⁴	T/yr ⁴
Dry kilns – four total	34.8	5.0	75.7

- 1) In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and recordkeeping requirements.
- 2) Particulate matter with and aerodynamic diameter less than or equal to a nominal ten (10) micrometers including condensable particulate as defined in IDAPA 58.01.01.006.84.
- 3) Pounds per calendar day.
- 4) Tons per consecutive 12-calendar month period.

[12/5/2012]

- Emissions of methanol from the kilns shall not equal or exceed 10 tons per any consecutive 12-calendar month period.

[12/5/2012]

- Emissions of any combination of HAPs from the kilns shall not equal or exceed 19.1 tons per any consecutive 12- calendar month period.

[12/5/2012]

4.4 Opacity Limit

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

[8/18/2003]

Operating Requirements

4.5 Lumber Throughput

The maximum green lumber throughput to the four dry kilns shall not exceed 160 million board feet per any consecutive 12-calendar month period (MMBF/yr).

[12/5/2012]

Monitoring and Recordkeeping Requirements

4.6 Throughput Monitoring

- The permittee shall monitor and record, monthly and annually, the green lumber throughput to the four dry kilns to demonstrate compliance with Permit Conditions 4.5. Throughput shall be recorded as million board feet. Annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-calendar month period.
- In order to demonstrate compliance with the VOC, methanol and total HAP emission limits each month the permittee shall monitor and record the throughput of each of the following types of lumber to the kilns in thousand board feet (mbf/month), and each month the permittee shall record the throughput during the previous consecutive 12 month period (MBF/consecutive 12 month period):

Ponderosa Pine;

Larch;

Englemann Spruce and Lodge Pole Pine (ESLP) (aggregated);

Douglas Fir;

Alpine Fir (AF);

Hem-Fir (Western Hemlock and Grand (White) Fir-aggregated);

Cedar; and

Any other species dried (aggregated).

The permittee may elect to monitor and record each individual species that makes up the ESLP and Hem-Fir lumber group, but is not required to monitor each individual species that makes up these groups.

[12/5/2012]

- 4.7 In order to demonstrate compliance with VOC, methanol, and total HAP emission limits each month the permittee shall calculate and record the amount of VOC, methanol and total HAP emissions from the drying kilns using the emission factors listed in Table 4.3 or DEQ approved alternative. The permittee shall calculate and record the total:

- VOC;
- Methanol;
- and total HAP

emissions during the previous consecutive 12 month period. Emission rates shall be recorded in tons per year.

[12/5/2012]

Table 4.3 EMISSIONS FACTORS

Lumber Type	Total HAP (lb/mbf) ¹	Methanol (lb/mbf) ¹	VOC (lb/mbf) ¹
Ponderosa Pine	0.148	0.102	2.46
Douglas Fir	0.171	0.096	1.03
Larch	0.291	0.187	0.25
Hemlock	0.243	0.133	0.24
Grand (White) Fir	0.189	0.122	0.7
Hem Fir	0.243	0.133	0.7
Lodgepole	0.092	0.060	1.32
Spruce	0.092	0.054	0.11
Engleman Spruce/Loddge Pole (ESLP)	0.092	0.054	1.32
Alpine Fir	0.291	0.187	0.7
Cedar	0.092	0.054	0.15
Any other type	0.291	0.187	2.46

¹ Pounds per thousand board feet.

[12/5/2012]

5. STETSON PLANER MILL

5.1 Process Description

After drying in the kilns, lumber is planed to final dimensions in the planer mill in one of two high speed planers (Stetson or Newman). Shavings from each of the planers are pneumatically transferred to overhead truck bins through separate cyclonic collector, followed by a rotary air locks and baghouses.

The planed lumber is then trimmed to marketable length. Trim ends are reduced in a hog and are pneumatically transferred to the overhead truck shavings bins along with the shavings. The lumber is then graded, inked, stacked, and banded. The lumber is then stored until it is shipped off-site by rail or truck.

5.2 Control Description

Table 5.1 STETSON PLANER MILL

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Stetson planer	Cyclone followed by a baghouse	Stetson planer vents

[8/31/2009]

Operating Requirements

5.3 The permittee shall have developed a baghouse procedures document for the inspection and operation of the baghouse which controls the PM and PM₁₀ emissions from the planer mill stack. The baghouse 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 baghouse procedures document shall describe the procedures that will be followed to comply with General Provision 7. 2 and shall contain requirements for quarterly see-no-see visible emissions inspections of the baghouse. The inspections shall occur during daylight hours and under normal operating conditions.

The baghouse 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 anytime. At a minimum the document shall include:

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

The permittee shall maintain records of the results of each baghouse inspections in accordance with General Provision 7.10. 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.

Any changes to the baghouse procedures document shall be submitted to DEQ within 15 days of the change and shall contain a certification by a responsible official.

The baghouse 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 baghouse procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[7/8/2014]

6. SUMMARY OF EMISSION LIMITS

Table 6.1 EMISSION LIMITS¹

Source Description	Hourly PM ₁₀ ² Emissions (lb/hr) ³	Annual PM ₁₀ Emissions (T/yr) ⁴	CO	VOC	Methanol	Total HAP
			(T/yr) ⁴	(T/yr) ⁴	(T/yr) ⁴	(T/yr) ⁴
Boiler – EFB stack	6.51	28.5	391	--	--	5.68
Boiler – disengagement chamber stack	0.18	0.79	--	--	--	--
Dry kilns – four total	34.8 ⁵	5.0	--	75.7	< 10.0	<19.1

- 1) In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and recordkeeping requirements.
- 2) Particulate matter with and aerodynamic diameter less than or equal to a nominal ten (10) micrometers including condensable particulate as defined in IDAPA 58.01.01.006.84.
- 3) Pounds per hour.
- 4) Tons per consecutive 12-calendar month period.
- 5) Units are in pounds per day (24-hour average)

[12/5/2012]

7. GENERAL PROVISIONS

General Compliance

- 7.1 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.]

- 7.2 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]

- 7.3 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

- 7.4 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 a Tier I 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

- 7.5 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]

- 7.6 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

- 7.7 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.
- 7.8 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.
- 7.9 Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 7.10 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 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

- 7.11 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.

Certification

- 7.12 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

- 7.13 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

- 7.14 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

- 7.15 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

- 7.16 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]