STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

January 8, 2008

Certified Mail No. 7190 0596 0014 0000 1478

Bryan Kellar
Environmental Manager
Fiber Composites, LLC
420 West Franklin
Meridian, ID 83642

RE: Facility ID No. 001-00115, Fiber Composites, LLC, Meridian
Final Tier II Operating Permit and Permit to Construct Letter

Dear Mr. Kellar:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit and Permit to Construct No. T2-2007.0129 to Fiber Composites, LLC located at Meridian for the Tier II Operating Permit renewal in accordance with IDAPA 58.01.01.400 through 406, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed Tier II Operating Permit and Permit to Construct is based on the information contained in your permit application. This Tier II Operating Permit and Permit to Construct is effective immediately and replaces your previous Tier II Operating Permit No. T2-000037, issued July 12, 2002, the terms and conditions of which no longer apply. This permit does not release Fiber Composites, LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. Please note that this permit expires five years after the issuance date.

In accordance with IDAPA 58.01.01.407, DEQ has assessed the emissions for this permit and determined that a Tier II processing fee of $5,000 will be due. A fee invoice will be sent to you from the DEQ fiscal office shortly. Failure to submit a Tier II operating permit processing fee within 45 days of receipt of the fee invoice will result in a monthly accrual of interest in the amount of 12% per annum on the outstanding balance until the fee is paid in full.

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,

Mike Simon
Stationary Source Manager
Air Quality Division

MS/SYC/hp
Enclosure

Permit No. T2-2007.0129

Printed on Recycled Paper

✂----------

Please make checks payable to: Department of Environmental Quality. Please write your permit number on the check and remit the fee and this information to the following:

Department of Environmental Quality
Fiscal Office – Air Quality
1410 N. Hilton, Boise, ID 83706-1255

Amount Enclosed: $ _____._____ Check No.: _____

DEPARTMENT USE ONLY:			
Facility	Fiber Composites, LLC	**Facility ID:**	001-00115
Project	Tier II operating permit renewal	**Permit No.:**	T2-2007.0129
Fee Type:	Tier II Processing Fee	**Fee Amount:**	$ 5,000.00
Routing Instructions: Copy Air Program upon receipt of fee.			

✂----------

HARD COPY TO FACILITY

en: Tom Krinke, Boise Regional Office
Shawnee Chen, Permit Writer
Marilyn Seymore/ Pat Rayne, AQ Division
Stationary Source Administrative Assistant
Lauren Camara, AQ Public Comment

en-web: Laurie Kral, U.S. EPA Region 10

bec: Jean Francis, Fiscal (Ltr Only)

ec: Bryan Kellar, bryank@fibercomposites.com

c: Reading File (Ltr Only)
Source File
Permit Binder
Bill Rogers, Permit Coordinator (Ltr Only)
Phyllis Heitman, AQ Division (Ltr Only)

Air Quality
TIER II OPERATING PERMIT
and
PERMIT TO CONSTRUCT

State of Idaho
Department of Environmental Quality

PERMIT No.: T2-2007.0129
FACILITY ID No.: 001-00115
AQCR: 64 **CLASS:** B
SIC: 2431 **ZONE:** 11
UTM COORDINATE (km): 548.3, 4828.3

1. **PERMITTEE** Fiber Composites, LLC			
2. **PROJECT** Tier II Operating Permit Renewal and PTC Incorporation			
3. **MAILING ADDRESS** 420 West Franklin	**CITY** Meridian	**STATE** Idaho	**ZIP** 83642
4. **FACILITY CONTACT** Bryan Kellar	**TITLE** Environmental Manager/Engineer	**TELEPHONE** (208) 888-6798	
5. **RESPONSIBLE OFFICIAL** Michael Krause	**TITLE** Vice President of Operations	**TELEPHONE** (208) 888-6798	
6. **EXACT PLANT LOCATION** 420 West Franklin		**COUNTY** Ada	
7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS** Composite decking manufacturing			

8. **PERMIT AUTHORITY**

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228 and IDAPA 58.01.01.400 through 470, respectively. This permit 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.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

The permit to construct conditions in 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.

for

TRACY DROUIN, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:	January 8, 2008
DATE MODIFIED/REVISED:	
DATE EXPIRES:	January 8, 2013

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu/hr	million British thermal units per hour
NO_X	nitrogen oxides
O&M	operations and maintenance
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
SIC	Standard Industrial Classification
SO_2	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. TIER II OPERATING PERMIT SCOPE

Purpose

1.1 This permitting action is a Tier II renewal and incorporates administrative emission unit name changes. This permitting action also incorporates a name change from an ownership change. The facility was formerly LP Wood Polymers, also known as Louisiana-Pacific Corporation.

1.2 This Tier II operating permit renewal incorporates and replaces the following permits, the terms and conditions of which shall no longer apply:

- Permit to Construct No. P-050039, issued March 7, 2006
- Tier II Operating Permit No. T2-000037, issued July 12, 2002

Regulated Sources

1.3 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	Trim End Hog	10 RA Baghouse (C17)
3	Wood Storage Silo	8 RA Baghouse (C18)
3	Primary Hammermill	Donaldson Baghouse (C3)
3	Secondary Hammermill	Big Mac Baghouse (C22)
3	Storage Silo	Noltec Storage Silo Baghouse (C1A)
4	Wood Dryer #1	Entec Dryer #1 Baghouse (C15)
4	Wood Dryer #2	Entec Dryer #2 Baghouse (C16)
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)
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)

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

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.

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 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.

[SIP Condition]

2.9 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.

Open Burning

2.10 The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.600-617.

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 Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

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 No person shall 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

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 PM_{10} 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 wood handling system.

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

Emissions Sources	Emissions Control	Emissions Point
Trim End Hog	10 RA Baghouse	C17
Wood Storage Silo	8 RABaghouse	C18
Primary Hammermill	Donaldson Baghouse	C3
Secondary Hammermill	Big Mac Baghouse	C22
Storage Silo	Noltec Storage Silo Baghouse	C1A

[PTC Condition]

Emissions Limits

3.3 Emission Limits

The PM_{10} emissions from the wood handling system baghouse stacks shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table3.2 WOOD HANDLING SYSTEM BAGHOUSE EMISSIONS LIMITS*

Source Description	PM_{10}	
	lb/hr	T/yr
10 RA Baghouse (C17)	0.87	3.80
8 RABaghouse (C18)	0.39	1.73
Donaldson Baghouse (C3)	0.28	1.22
Big Mac Baghouse (C22)	0.24	2.09
Noltec Storage Silo Baghouse (C1A)	0.014	0.06

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

[SIP Condition]

3.4 Grain Loading Limits

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

[PTC Condition]

Operating Requirements

3.5 Pressure Drop Monitoring Device

The permittee shall install, calibrate, operate, and maintain pressure drop monitoring devices to continuously measure the pressure drop across wood handling system baghouse stacks. The pressure drop monitoring devices shall be calibrated and maintained according to the individual manufacturers and O&M manual specifications for each baghouse. Documentation of the manufacturer's recommended operating specifications for each baghouse shall remain onsite at all times, and shall be made available to DEQ representatives upon request.

[PTC Condition]

3.6 Baghouse Pressure Drop

The pressure drop across the wood handling system baghouses shall be maintained within individual manufacturer and O&M manual specifications. Documentation of the operating pressure drop specifications for each baghouse shall remain onsite at all times, and shall be made available to DEQ representatives upon request.

[PTC Condition]

Monitoring and Recordkeeping Requirements

3.7 Monitor Operating Parameters

The permittee shall monitor and record the pressure drop across wood handling system baghouses once per week while the baghouses are operating. Records of this information shall remain onsite for the most recent five-year period, and shall be made available to DEQ representatives upon request.

[SIP Condition]

3.8 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for the wood handling system baghouses, and the pressure drop monitoring devices required by Permit Condition 3.6 for each baghouse. The O & M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for each of the baghouses. 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.

[PTC Condition]

4. WOOD DRYERS

4.1 Process Description

Two 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 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

The two wood dryers are emissions sources. The air pollutants emitted by the wood dryers are natural gas combustion products (i.e. PM, CO, NO_x, SO_2, and VOC's). All of these pollutants are vented to two dedicated baghouses; only particulate matter is controlled. The two baghouse stacks join together and exit the building as one stack. The combined baghouse stack or vent is the emissions points. Table 4.1 lists the emissions sources, the air pollution control devices, the unique air pollution control device unit identification numbers associated with the two 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	Entec Dryer #1 Baghouse	C15	C15
Wood dryer #2	Entec Dryer #2 Baghouse	C16	C16

[PTC Condition]

Emissions Limits

4.3 Emissions Limits

The PM_{10} 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
Entec Dryer #1 Baghouse (C15)	0.39	1.73
Entec Dryer #2 Baghouse (C16)	0.39	1.73

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

[PTC Condition]

4.4 Grain Loading Limits

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

[PTC Condition]

Operating Requirements

4.5 Pressure Drop Monitoring Device

The permittee shall install, calibrate, operate, and maintain pressure drop monitoring devices to continuously measure the pressure drop across Entec Dryer #1 baghouse and Entec Dryer #2 baghouse. The pressure drop monitoring devices shall be calibrated and maintained according to the manufacturers and O&M manual specifications. Documentation of the manufacturers recommended operating specifications shall remain onsite at all times, and shall be made available to DEQ representatives upon request.

[PTC Condition]

4.6 Baghouse Pressure Drop

The pressure drop across Entec Dryer #1 baghouse and Entec Dryer #2 baghouse shall be maintained within manufacturer and O&M manual specifications. Documentation of the operating pressure drop specifications for each baghouse shall remain onsite at all times, and shall be made available to DEQ representatives upon request.

[PTC Condition]

Monitoring and Recordkeeping Requirements

4.7 Monitor Operating Parameters

The permittee shall monitor and record the pressure drop across Wood Dryer Baghouse #1 and Wood Dryer Baghouse #2 once per week while the baghouses are operating. Records of this information shall remain onsite for the most recent five-year period, and shall be made available to DEQ representatives upon request.

[PTC Condition]

4.8 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for Entec Dryer #1 baghouse, Entec Dryer #2 baghouse, and the pressure drop monitoring devices required by Permit Condition 4.6 for each baghouse. The O & M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouses. 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.

[PTC Condition]

5. FINISHING LINE SYSTEM

5.1 Process Description

Finished boards from the extruders are conveyed directly into three combination molders and then embossed. 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 and are connected to a heated roll embossing machine. 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.

5.2 Emissions Control Description

The molders are the emissions sources for the two finishing lines. Particulate matter emissions from each emissions source are vented to three separate baghouses. The baghouse stacks or vents are the emissions points. Table 5.1 lists the proposed emissions sources, the emissions points, and the unique emissions point unit identification numbers associated with new 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

[PTC Condition]

Emissions Limits

5.3 Emissions Limits

The PM_{10} emissions from the Line #10 molder baghouse stack, Line #11 molder baghouse stack, and Line #12 molder baghouse stack shall not exceed any corresponding emissions rate limits listed in Table 5.2.

Table 5.2 FINISHING LINE BAGHOUSE NOS. 1, 2, AND 4 EMISSIONS RATE LIMITS

Source Description	PM_{10}	
	lb/hr	T/yr
Line #10 Molder Baghouse (C12)	0.26	1.13
Line #11 Molder Baghouse	0.27	1.19
Line #12 Molder Baghouse	0.25	1.10

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

[PTC Condition]

5.4 Grain Loading Limits

The PM 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).

[PTC Condition]

Operating Requirements

5.5 Pressure Drop Monitoring Device

The permittee shall install, calibrate, operate, and maintain, pressure drop monitoring devices to continuously measure the pressure drop across Line #10 molder baghouse, Line #11 molder baghouse, and Line #12 molder baghouse. The pressure drop monitoring devices shall be calibrated and maintained according to the individual manufacturers and O&M manual specifications. Documentation of the manufacturers recommended operating specifications shall remain onsite at all times, and shall be made available to DEQ representatives upon request.

[PTC Condition]

5.6 Baghouse Pressure Drop

The pressure drop across Line #10 molder baghouse, Line #11 molder baghouse, and Line #12 molder baghouse shall be maintained within individual manufacturer and O&M manual specifications. Documentation of the operating pressure drop specifications for each baghouse shall remain onsite at all times, and shall be made available to DEQ representatives upon request.

[PTC Condition]

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.

[PTC Condition]

Monitoring and Recordkeeping Requirements

5.8 Monitor Operating Parameters

The permittee shall monitor and record the pressure drop across Line #10 molder baghouse, Line #11 molder baghouse, and Line #12 molder baghouse once per week while the baghouses are operating. Records of this information shall remain onsite for the most recent five-year period, and shall be made available to DEQ representatives upon request.

[PTC Condition]

5.9 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for Line #10 molder baghouse, Line #11 molder baghouse, and Line #12 molder baghouse, and the pressure drop monitoring devices required by Permit Condition 5.6 for each baghouse. The O & M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouses. 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.

[PTC Condition]

6. HDPE STORAGE SILO AND DRY WOOD DAY 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.

This description is for informational purposes only.

6.2 Emissions Control Description

The HDPE storage silo is the emissions source, and the existing bin vent is the emissions point. Dry Wood Day Bin #1 and Dry Wood Day Bin #2 are the emissions sources, and the bin filters are the emissions points. Table 5.1 lists the emissions source, the emissions point, and the unique emissions point unit identification number associated with the HDPE storage silo and the dry wood day bins.

Table 5.1 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

[PTC Condition]

Emissions Limits

6.3 Emissions Limits

The PM_{10} 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 5.2.

Table 5.2 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

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

[PTC Condition]

6.4 Grain Loading Limits

The PM 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).

[PTC Condition]

Monitoring and Recordkeeping Requirements

6.5 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for the HDPE Silo Bin Vent #1, Dry Wood Day Bin Filter #1, and Dry Wood Day Bin Filter #2 which describes the procedures that will be followed to comply with General Provision 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.

[PTC Condition]

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]
10 RA Baghouse (C17)	0.87	3.80
8 RA Baghouse (C18)	0.39	1.73
Donaldson Baghouse (C3)[b, c,]	0.279	1.22
Big Mac Baghouse (C22)	0.48	2.09
Noltec Storage Silo Baghouse (C1A)[b,]	0.014	0.06
Entec Dryer #1 Baghouse (C15)	0.39	1.73
Entec Dryer #2 Baghouse (C16)	0.39	1.73
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
HDPE Silo Bin Vent #1 (C7)[d]	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
Total	**2.79**	**16.10**

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 0.293 lb/hr and 1.28 T/yr.
d. Listed in Tier II Operating Permit No. 001-00115 Technical Analysis, but not in the permit.

[SIP Condition]

8. TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

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 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.]

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]

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

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

   a. 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;

   b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

   c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

   d. 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

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

   a. A notification of the date of initiation of construction, within five working days after occurrence;

   b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

c. 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;

d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and

e. 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, 5/1/94]

Performance Testing

6. 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.

   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.

   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. 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

8. 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

9. 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

10. 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

11. 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]

Expiration and Renewal

12. This permit shall be renewable on the expiration date, provided the permittee submits an application for renewal to the Department and continues to meet all terms and conditions contained in the permit. The expiration of this permit will not affect the operation of the stationary source or facility during the administrative procedure period associated with the permit renewal process.

[IDAPA 58.01.01.209.04, 7/1/02]

Transferability

13. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06 and 404.05.

[IDAPA 58.01.01.209.06, 404.05, 4/11/06]

Severability

14. 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 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]