



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502  
www.deq.idaho.gov

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

March 8, 2018

Eric Laurance, General Manager  
Lignetics of Idaho, Inc.  
P.O. Box 1706  
Sandpoint, ID 83864

RE: Facility ID No. 017-00029, Lignetics of Idaho, Kootenai  
Final Permit Letter

Dear Mr. Laurance:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2015.0003 project 61937 to Lignetics of Idaho, Inc. located at Kootenai for revising Permit Conditions 2.13 and 2.27.1 of the existing 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 August 28, 2017.

This permit is effective immediately and replaces PTC No. P-2015.0003, issued on November 2, 2015. This permit does not release Lignetics of Idaho, Inc. 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, Air Quality Analyst, 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 Shawnee Chen at (208) 373-0502 or [shawnee.chen@deq.idaho.gov](mailto:shawnee.chen@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

*for* Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\syc

Permit No. P-2015.0003 PROJ 61937

Enclosures

# Air Quality

## PERMIT TO CONSTRUCT

---

<b>Permittee</b>	Lignetics of Idaho, Inc.
<b>Permit Number</b>	P-2015.0003
<b>Project ID</b>	61937
<b>Facility ID</b>	017-00029
<b>Facility Location</b>	Highway 200 East, Kootenai, Idaho

### Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

**Date Issued** March 8, 2018



---

**Shawnee Chen, P.E., Permit Writer**



---

**Mike Simon, Stationary Source Manager**

for,

## Contents

1	Permit Scope.....	3
2	Wood Pellet Manufacturing .....	4
3	General Provisions.....	15

# 1 Permit Scope

## Purpose

- 1.1 This permit is a revision of the facility's existing permit to construct (PTC). This permit revision does not include any changes to equipment at the facility. This permitting action is for improving fugitive emissions control of the truck dump area and for revising the drum dryer (rotary dryer) throughput limit and its corresponding monitoring and recordkeeping requirements. [3/8/2018]
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin. [3/8/2018]
- 1.3 This PTC replaces PTC No. P-2015.0003, issued on November 2, 2015. [3/8/2018]

## Regulated Sources

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

**Table 1.1 Regulated Sources**

Permit Section	Source	Control Equipment
2	Rotary wood-furnish (sawdust and wood shavings) dryer heated with either a 45 MMBtu/hr wood-fired burner or 30 MMBtu/hr multi-fuel burner	High Efficiency Primary Cyclone and Quad Multiclone
	Fines Cyclone Stack	Cyclone
	Pellet Cooler Stack	Cyclone

## 2 Wood Pellet Manufacturing

### 2.1 Process Description

This facility processes green sawdust and wood shavings from lumber mills (wood furnish) into wood pellets and “presto” logs used as wood fuel in pellet stoves and traditional wood stoves and fireplaces. Wood furnish is dried in a drum dryer either with a 30 MMBtu/hr multi-fuel burner fueled by natural gas, fuel oil, or a mixture of fuel oil and used-oil-derived-fuel, or with a 45 MMBtu/hr wood-fired burner that is fueled with wood furnish. The multi-fuel burner and wood-fired burner cannot be used simultaneously.

### 2.2 Control Device Descriptions

Emissions from the drum dryer, including combustion emissions, are controlled by a high efficiency primary cyclone and quad multiclone connected in series.

Emissions from a natural gas-fired hot water boiler located on site are not controlled.

**Table 2.1 Dryer Burners Description**

Emissions Units / Processes	Control Devices	Emission Points
Rotary Dryer or Drum Dryer	High Efficiency Primary Cyclone and Quad Multiclone	Dryer Stack

## Emission Limits

### 2.3 Emission Limits

The emissions from the dryer stack, fines cyclone stack, and pellet cooler stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

**Table 2.2 Emission Limits**

Source Description	PM <sub>10</sub> <sup>(a)</sup>		SO <sub>2</sub>		NO <sub>x</sub>		CO	
	lb/hr <sup>(b)</sup>	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Dryer Stack	15.7	44.1	14.91	65.3	9.6	42	15	66
Fines Cyclone Stack	0.7	3.1	--	--	--	--	--	--
Pellet Cooler Stack	0.26	1.2	--	--	--	--	--	--

a Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.

b. Based on 24-hr averaging time period

2.4 Arsenic emissions from the dryer stack shall not exceed  $1.35 \times 10^{-3}$  lb/hr. Arsenic emissions from the dryer stack shall not exceed  $5.9 \times 10^{-3}$  T/yr. [3/8/2018]

2.5 Hexavalent chromium emissions from the dryer stack shall not exceed  $4.86 \times 10^{-4}$  lb/hr. Hexavalent chromium emissions from the dryer stack shall not exceed  $2.14 \times 10^{-3}$  T/yr. [11/2/2015]

2.6 Nickel emissions from the dryer stack shall not exceed  $2.47 \times 10^{-3}$  lb/hr. Nickel emissions from the dryer stack shall not exceed 0.108 T/yr. [11/2/2015]

- 2.7 Lead emissions from the dryer stack shall not exceed 0.16 lb/hr. Lead emissions from the dryer stack shall not exceed 0.72 T/yr.
- 2.8 Formaldehyde emissions from the dryer stack shall not exceed 0.81 lb/hr. Formaldehyde emissions from the dryer stack shall not exceed 3.5 T/yr.
- 2.9 **Opacity Limit**  
Emissions from any stack, vent, or functionally equivalent opening 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.
- 2.10 **Visible Emissions at the Property Boundary**  
Visible emissions shall not be observed leaving the property boundary at any time. Visible emissions shall be determined by EPA Reference Method 22, as described in 40 CFR 60, Appendix A, or using a DEQ-approved alternative method.
- 2.11 **Control of Odors**  
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, as required by IDAPA 58.01.01.776.

### **Operating Requirements**

- 2.12 **Allowable Burner Fuel**  
The permittee shall use only wood furnish, natural gas, No. 2 fuel oil, or a mixture of No. 2 fuel oil and used-oil-derived fuel.
- 2.13 **Drum Dryer Production Rate Limit and Moisture Content Specification**  
The production rate of the drum dryer shall not exceed 264 bone dry tons per day (BDT/day) based on moisture content of 0%. [3/8/2018]
- 2.14 **Natural Gas and Wood Furnish Fuel Combustion**
- When natural gas is combusted exclusively, no fuel throughput limit applies.
  - When wood furnish is combusted exclusively, no fuel throughput limit applies.
- [11/2/2015]
- 2.15 **No. 2 Fuel Oil Specifications**
- The permittee shall not combust more than 210 gallons of No. 2 fuel oil per hour.
  - The sulfur content in the No.2 fuel oil shall not exceed 0.5% by weight as required by IDAPA 58.01.01.725.
  - The No. 2 fuel oil combusted by the existing burner shall not exceed the fuel specification limits of Table 2.3.
- [11/2/2015]
- 2.16 **Used-Oil-Derived Fuel Specifications**  
Used-oil-derived fuel used as burner fuel shall not exceed any of the fuel specification limits listed in Table 2.3

**Table 2.3 Fuel Specifications**

Arsenic	0.77 ppm
Chromium (hexavalent)	0.28 ppm
Nickel	14.13 ppm
Ash	0.80 % by weight
Sulfur	0.50 % by weight
Lead	100 ppm

2.17 No. 2 Fuel Oil and Used-Oil-Derived Fuel Mixture Limits and Specifications

- The permittee may combust a mixture of 20% by volume No. 2 fuel oil and 80% by volume used-oil-derived-fuel (i.e. fuel mixture).
- The permittee shall not combust more than 210 gallons of the No. 2 fuel oil and used-oil-derived fuel mixture per hour.
- The permittee shall not operate the multi-fuel burner for more than 2,160 hours per any consecutive 12-month period when combusting the fuel oil mixture.

[11/2/2015]

2.18 Detection Limit of Analysis Method for Used-Oil-Derived Fuel

The detection limit of analysis methods used to determine the concentrations of arsenic, hexavalent chromium, and nickel in the used-oil-derived-fuel shall be 10% or less of the concentration limits listed in Table 2.3.

2.19 Dryer Burner Heat Input Capacity Limits

- The natural gas and fuel oil multi-fuel burner shall not have a rated heat input capacity greater than 30 MMBtu/hr.
- The wood furnish-fired burner shall not have a rated heat input capacity greater than 45 MMBtu/hr.

2.20 Dryer Burner Operations

The natural gas and fuel oil multi-fuel burner and the wood-fired burner shall not be operated concurrently.

2.21 Dryer Inlet Temperature

- The maximum dryer inlet temperature, as measured by any of the temperature sensors specified in Permit Condition 2.28 shall not exceed 1,000° F.
- The permittee shall monitor the dryer inlet temperature continuously and record the temperature at least once per hour, as specified in Permit Condition 2.28.
- The permittee shall install, maintain, and operate automatic controls that will shut down fuel feed to the burner if the dryer inlet temperature exceeds 950° F.

[11/2/2015]

2.22 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations 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 PM. 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, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces that 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.
- Keeping driving areas clear of wood and soil that may become entrained into the atmosphere.
- Manage material stockpiles by limiting pile heights below the height of the fugitive dust netting, limiting material movement during periods of high wind events, and limiting exposed pile faces to high winds (e.g., wind breaks; vegetative or screens) such that fugitive dust emissions continuously demonstrate compliance with IDAPA 58.01.01.651, do not carry over the fugitive dust netting, and do not leave the property boundary.
- Enclose the truck dump area.

[3/8/2018]

The permittee shall conduct a weekly 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 the 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 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.

[11/2/2015]

#### 2.23 Operations and Maintenance Manual Requirements

The permittee shall have developed an O&M manual for the high efficiency primary cyclone and the quad multiclone listed in Permit Condition 2.2 which describes the procedures that will be followed to comply with General Provision Permit Condition 3.2 and the air pollution control device requirements contained in this permit. The 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

At a minimum, the O&M manual shall:

- Be based on manufacturer's information to the extent practical. When the manufacturer's information is not used, other supporting information such as operating parameters measured during a successful performance test shall be included in the manual.
- Include procedures to determine if cyclones are not functioning properly.

- Include the frequency that the physical inspections are to occur.
- Include a record of the results of each inspection and any corrective action taken in response to the results of the inspection.

The manual shall remain onsite at all times and be made available to DEQ representatives upon request.

[11/2/2015]

2.24 Air Pollution Emergency Rules

The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550-562.

2.25 Fuel Switch

The permittee shall monitor and record each time the burner fuel is switched between the natural gas and fuel oil multi-fuel burner and the wood-fired burner, specifying which type of fuel is currently being used. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[11/2/2015]

2.26 Used-Oil-Derived Fuel and No. 2 Fuel Oil Certification

The permittee shall demonstrate compliance with the used-oil-derived-fuel and No. 2 fuel oil specifications in Permit Conditions 2.15 and 2.16 by obtaining a certification from the fuel supplier of each fuel on an as-received basis. The certification shall include the following information:

- The name and address of the fuel oil supplier.
- The measured concentration, expressed as ppm, of each constituent listed in Table 2.3.
- The ash content and the sulfur content of the fuel oil expressed as percent by weight (% by weight), as listed in Table 2.3.
- The analytical method or methods used to determine the concentration of each constituent, the fuel oil sulfur content, and the ash content listed in Table 2.3.
- The date and location of each sample.
- The date of each certification analysis.

2.27 Wood Furnish Throughput and Other Parametric Monitoring

2.27.1 The permittee shall demonstrate compliance with Drum Dryer Production Rate Limit and Moisture Content Specification Permit Condition using the DEQ approved Dryer Throughput Tracking procedures that are included in the statement of basis for this permit. Changes to the procedures are required to be approved by DEQ.

The procedures shall include, but not limited to, the following:

- Monitor and record the following tracking information daily:
  - Daily mass of packaged pellet production in tons,
  - Daily log production in tons,
  - The change in mass of pellets in the pellet bin daily in tons,
  - Record the daily average moisture content of green furnish and of finished product, respectively, and
  - Calculate the mass of fuel required to dry furnish from the daily average green furnish moisture content to the daily average finished product moisture content in tons.

- Provide the method, including the calculation, on how the daily drum dryer throughput is determined.
- Calculate daily drum dryer throughput in BDT/day.

[3/8/2018]

2.27.2 No. 2 Fuel Oil Throughput Monitoring

- The permittee shall monitor and record the amount of No. 2 fuel oil combusted by the multi-fuel burner per hour and while operating to demonstrate compliance with Permit Condition 2.15.
- The permittee shall demonstrate compliance with the fuel oil sulfur content limit specified in Permit Condition 2.15 by obtaining documentation of the sulfur content analysis for each shipment of No. 2 fuel oil on an as-received basis.

2.27.3 No. 2 Fuel Oil and Used-Oil-Derived Fuel Mixture Monitoring

- The permittee shall monitor and record the amount of No. 2 fuel oil and used-oil-derived-fuel mixture combusted by the multi-fuel burner per hour while operating to demonstrate compliance with Permit Condition 2.17.
- The permittee shall monitor and record the percent by volume No. 2 fuel oil and the percent by volume used-oil-derived-fuel oil contained in the fuel mixture combusted in the multi-fuel burner to demonstrate compliance with Permit Condition 2.17.
- The permittee shall monitor and record the hours of operation the multi-fuel burner operates when combusting the No. 2 fuel oil and used-oil-derived-fuel mixture monthly and annually to demonstrate compliance with Permit Condition 2.17. The annual hours of operation shall be determined by summing each monthly hours of operation over the previous consecutive 12-month period.

2.28 Dryer Temperature Monitoring

The permittee shall install, calibrate, maintain, and operate a monitoring system for the continuous measurement and recording of the gas temperature at the drum dryer inlet to demonstrate compliance with Permit Condition 2.21. The permittee shall maintain records of the highest temperature monitored during each hour of operation. All components of the monitoring system (sensors, chart recorder, alarm, and associated hardware) must be certified by the manufacturer to be accurate within 2% of the measured value and must be calibrated on at least a quarterly basis in accordance with manufacturer instructions.

The monitoring system must meet the following requirements:

- At least three temperature sensors shall be installed in a collinear arrangement across the dryer inlet opening. The first shall be located at the center of the dryer inlet while the second and third shall be located on opposite sides of the first and midway between the refractory wall and the center of the dryer.
- Each temperature sensor shall be shielded from radiant heat effects.
- The dryer-inlet gas-temperature monitoring system shall be equipped with an alarm to alert the operator if the inlet dryer gas temperature is in excess of that allowed by Permit Condition 2.21.

Each exceedance of the inlet dryer gas temperature limit specified in Permit Condition 2.21 shall be addressed using the procedures contained in IDAPA 58.01.01.130-136.

[11/2/2015]

## 2.29 Opacity Monitoring

The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions to demonstrate compliance with Permit Condition 2.9. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The visible emissions 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:

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 emission point in question. If the visible emissions are not eliminated, the permittee shall comply with item 2, below; 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%, 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 period or periods as an excess emission in the annual compliance certification and 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.

[11/2/2015]

## 2.30 Excess Emissions—General

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions. The provisions of IDAPA 58.01.01.130–136 shall govern in the event of conflicts between the excess emissions permit conditions (Permit Conditions 2.31 through 2.33) and the regulations of IDAPA 58.01.01.130–136.

During an excess emissions event, the permittee shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[11/2/2015]

## 2.31 Excess Emissions—Startup, Shutdown, and Scheduled Maintenance

In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.

Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the permittee demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.

Reporting and recording the information required pursuant to Permit Condition 2.33 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[11/2/2015]

2.32 Excess Emissions—Upset, Breakdown, or Safety Measures

In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.

Report and record the information required pursuant to Permit Condition 2.33 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

[11/2/2015]

2.33 Excess Emissions—Reporting and Recordkeeping

The permittee shall submit a written report to DEQ for each excess emissions event, no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

The permittee shall maintain excess emissions records at the facility for the most recent five calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the permittee in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[11/2/2015]

2.34 Fugitive Dust Complaint Records

The permittee shall maintain records of all fugitive dust complaints received. The records shall include, at a minimum, the date 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.

2.35 Reasonable Control Measures

The permittee shall monitor and record, during operation, the periodic method(s) used to reasonably control fugitive emissions from this facility. The records shall include the type of control used (e.g., water, environmentally safe chemical dust suppressants, spray bars, screen deck covers, etc.) as well as the circumstances under which no controls are used.

2.36 Odor Complaint Records

The permittee shall maintain records of all public 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 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.

2.37 Records Retention and Reporting

Records of information required by Permit Conditions 2.25 through 2.36 shall be maintained in compliance with General Provision 3.10.

## Performance Testing Requirements

2.38 Performance Testing

The permittee shall conduct a performance test in accordance with the provisions of IDAPA 58.01.01.157 on the drum dryer stack in order to determine compliance with the PM<sub>10</sub> pound per hour emission limits and the visible emissions standard no later than April 5, 2022. The permittee shall furnish DEQ a written report of the results of the performance tests in accordance with General Provision 3.9.

All performance testing shall be conducted in accordance with the requirements of IDAPA 58.01.01.157.02(a) which states:

*The test must be conducted under operational conditions specified in the applicable state or federal regulation, rule, permit, order, consent decree or by Department approval. If the operational requirements are not specified, the source should test at worst-case normal operating conditions. Worst-case normal conditions are those conditions of fuel type, and moisture, process material makeup and moisture and process procedures which are changeable or which could reasonably be expected to be encountered during the operation of the facility and which would result in the highest pollutant emissions from the facility.*

The permittee may conduct performance tests on the drum dryer stack prior to April 5, 2022 to demonstrate compliance with the PM<sub>10</sub> pound per hour emission limits and visible emission limits for the drum dryer stack while operating at modified operating parameters. Once the performance test is completed, the permittee may submit a permit to construct application requesting to operate in accordance with the modified operating parameters. The application shall include the performance test report and justification for the modified operating parameters.

Ongoing testing on the drum dryer stack shall be conducted according to the following schedule.

**Tiered Test Frequency**

<b>Most Recent Performance Test Result</b>	<b>Next Test Required</b>
Emissions are more than 90 percent of the PM <sub>10</sub> pound per hour emission limit in Permit Condition 2.3.	Within 12 months of the most recent test
Emissions are between 75 and 90 percent of the PM <sub>10</sub> pound per hour emission limit in Permit Condition 2.3.	Within three years of the most recent test
Emissions are less than 75 percent of the PM <sub>10</sub> pound per hour emission limit in Permit Condition 2.3.	Within five years of the most recent test

Whenever performance testing is required by this schedule the permittee shall determine the PM<sub>10</sub> emissions rate in pounds per hour and visible emissions using the methods and procedures contained in IDAPA 58.01.01.625

The permittee shall monitor and record the following information during each performance test:

- The production rate of the drum dryer in BDT shall be monitored and recorded according to the DEQ approved test protocol during each performance test run.
- The moisture content of the dried material shall be monitored and recorded at least once during each performance test run.
- The burner temperature setting shall be recorded at least once during each performance test run unless the temperature is changed during the run, then the temperature setting shall be recorded each time it is changed during the test run.
- The dryer inlet temperature shall be recorded at least once every 15 minutes during each performance test run.

[3/8/2018]

**Reporting Requirements**

2.39 Performance Test Protocol

The permittee shall submit a compliance test protocol for approval at least 30 days prior to conducting any compliance test required by this permit. The protocol shall include how the production rate in BDT of the drum dryer will be determined during source test and what will be included in the source test report.

[3/8/2018]

2.40 Performance Test Report

The permittee shall submit a report of the results of any performance tests required by this permit including all required process data, to DEQ within 60 days after the date on which any required compliance test is concluded, in accordance with requirements in source test protocol, IDAPA 58.01.01.157, and the Performance Test General Provision.

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 Pkwy  
Coeur D'Alene, ID 83814  
Phone: (208) 769-1422  
Fax: (208) 769-1404

**[3/8/2018]**

## 3 General Provisions

### General Compliance

3.1 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.]

3.2 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]

3.3 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

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

- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

### Construction and Operation Notification

3.5 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]

3.6 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; and

- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

## Performance Testing

3.7 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.

3.8 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.

3.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

## Monitoring and Recordkeeping

3.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

### **Excess Emissions**

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

[IDAPA 58.01.01.130–136, 4/5/00]

### **Certification**

- 3.12 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**

- 3.13 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**

- 3.14 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**

- 3.15 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**

- 3.16 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]