



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Governor Brad Little
Director John H. Tippetts

February 12, 2019

Randal Nelson, Chief Marketing Officer
Cutting Edge Logs, LLC
P.O. Box 170398
Boise, ID 83717

RE: Facility ID No. 001-00208, Cutting Edge Logs, LLC, Boise
Final Permit Letter

Dear Mr. Nelson:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0060 Project 62155 to Cutting Edge Logs, LLC located at Boise for a facility name and ownership change and removal of sold or dismantled equipment from the permit. 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 December 21, 2018.

This permit is effective immediately and replaces PTC No. P-2007.0060, issued on August 15, 2007. This permit does not release Cutting Edge Logs, LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard St., Boise, ID 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with David Luft, Air Quality Manager, at (208) 373-0201 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 Rakaël Pope at (208) 373-0502 or Rakaël.Pope@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".

MS, Mike Simon
Stationary Source Program Manager
Air Quality Division

MSvp

Permit No. P-2007.0060 PROJ 62155
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Cutting Edge Logs, LLC
Permit Number P-2007.0060
Project ID 62155
Facility ID 001-00208
Facility Location 1625 Yamhill Road
Boise, ID 83716

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 February 12, 2019


Rakael Pope, Permit Writer


Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) to transfer the facility's ownership from Treasure Valley Forest Products, Boise to Cutting Edge Logs, LLC. Also, this permit revision includes removal of permit conditions associated with eight emission sources from facility's regulated source inventory which have been dismantled and/or sold.
- 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.
- 1.3 This PTC replaces Permit to Construct No. P-2007.0060, issued on August 15, 2007.

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	<u>Green Lathe:</u> Max Capacity: 10,264 tons dry wood/yr Actual Operation: 2080 hr/yr Max Operation Capacity: 8760 hr/yr <u>Processor A:</u> Max Capacity: 1,026 tons dry wood/yr Actual Operation: 2080 hr/yr Max Operation Capacity: 8760 hr/yr <u>Processor B:</u> Max Capacity: 153 tons dry wood/yr Actual Operation: 2080 hr/yr Max Operation Capacity: 8760 hr/yr <u>Pole Lathe:</u> Max Capacity: 998 tons dry wood/yr Actual Operation: 2080 hr/yr Max Operation Capacity: 8760 hr/yr	<u>Green Lathe Cyclone</u> <u>Processor A Cyclone</u> <u>Processor B Cyclone</u> <u>Pole Lathe Cyclone</u>
	<u>Green Lathe Cyclone and Bin:</u> Max Capacity: 10,264 tons dry wood/yr Actual Operation: 2080 hr/yr Max Operation Capacity: 8760 hr/yr <u>Processor A Cyclone and Bin:</u> Max Capacity: 1,026 tons dry wood/yr Actual Operation: 2080 hr/yr Max Operation Capacity: 8760 hr/yr <u>Processor B Cyclone and Bin:</u> Max Capacity: 153 tons dry wood/yr Actual Operation: 2080 hr/yr Max Operation Capacity: 8760 hr/yr <u>Pole Lathe Cyclone and Bin:</u> Max Capacity: 998 tons dry wood/yr Actual Operation: 2080 hr/yr Max Operation Capacity: 8760 hr/yr	None

[2/12/2019]

2 Log Processing

2.1 Process Description

Cutting Edge Logs, LLC facility operates two log processors and two lathes that emit only particulate matter from the processors and associated cyclones and chip bins. The green lathe roughly sizes green logs. Wood residue from the lathing process is drawn through a cyclone and collected in adjacent bins. Processors A and B are used to shave logs. Wood residue from the processing is drawn through a cyclone and collected in adjacent bins. The Pole Lathe is used to size logs. Wood residue from the processing is drawn through a cyclone and collected in adjacent bins. The facility produces wall logs, beams, and poles, which are mainly used for the construction of log homes. Railing, log siding, and similar products are also produced on a limited basis.

[2/12/2019]

2.2 Control Device Descriptions

Table 2.1 Log Processing Description

Emissions Units / Processes	Control Devices	Emission Points
Green Lathe	Green Lathe Cyclone	GCYCL Stack
Processor A	Processor A Cyclone	ACYCL Stack
Processor B	Processor B Cyclone	BCYCL Stack
Pole Lathe	Pole Lathe Cyclone	PCYCL Stack
Green Lathe Cyclone Bin	None	GBIN
Processor A Cyclone Bin	None	ABIN
Processor B Cyclone Bin	None	BBIN
Pole Lathe Cyclone Bin	None	PBIN

[2/12/2019]

Emission Limits

2.3 Emission Limits

The emissions from the log processing operation stacks shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Logging Operation Emission Limits ^(a)

Source Description	PM ₁₀ ^(b)	
	lb/hr ^(c)	T/yr ^(d)
Green Lathe	1.23	1.28
Processor A	0.25	0.13
Processor B	0.02	0.02
Pole Lathe	0.12	0.12

- a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b) 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.
- c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d) Tons per any consecutive 12-calendar month period.

[2/12/2019]

2.4 Opacity Limit

Emissions from the log processing operation stack, or any other stack, vent, or functionally equivalent opening associated with the log processing operation, 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.

Operating Requirements

2.5 Fugitive Emissions

All reasonable precautions shall be taken to prevent fugitive PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

2.6 Annual Wood Processed Throughput Limit

The total quantity of wood processed in facility shall not exceed 10,264 tons dry wood product and sawdust per any consecutive 12-month period.

[2/12/2019]

Monitoring and Recordkeeping Requirements

2.7 Annual Wood Processed Throughput Limit Monitoring

Each calendar month, the permittee shall monitor and record the total wood processed in the Log Processing Operation for the previous month in units of tons dry wood product and sawdust per month. Annual wood processed throughput shall be determined by summing the monthly wood processed over the previous consecutive 12-month period to demonstrate compliance with the Annual Wood Processing Throughput Limits permit condition.

[2/12/2019]

2.8 Reasonable Control Measures Monitoring Requirement

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. This includes use of enclosed trucks. 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 monthly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittees 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. Records of this information shall be maintained in accordance with the General Provisions.

[2/12/2019]

2.9 Visible Emissions Monitoring Requirement

To demonstrate compliance with Permit Condition 2.4, the permittee shall conduct a monthly inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation 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, 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 permittees 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. Records of this information shall be maintained in accordance with the General Provisions.

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]