



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

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

March 26, 2014

Jesse Short, Mill Manager  
Idaho Forest Group LLC, IFG – Lewiston  
807 Mill Road  
P.O. Box 557  
Lewiston, Idaho 83501

RE: Facility ID No. 069-00003, IFG – Lewiston, Lewiston  
Final Tier I Operating Permit Letter

Dear Mr. Short:

The Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. T1-2012.0038 project 61338 to IFG – Lewiston at Lewiston in accordance with IDAPA 58.01.01.300 through 386, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units. This permit replaces Tier I Operating Permit No. T1-2012.0038 project 61078, issued July 24, 2013. The enclosed operating permit is requested by you in your underlying Permit to Construct application received on July 25, 2013. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the Rules.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Teresa Hiebert, Air Quality Analyst, at (208) 799-4370 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends 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 call 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".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS/SYC

Permit No. T1-2012.0038 PROJ 61338

Enclosure

**AIR QUALITY  
TIER I OPERATING PERMIT**

**Permittee** IFG Lewiston, LLC  
**Permit Number** T1-2012.0038  
**Project ID** 61338  
**Facility ID** 069-00003  
**Facility Location** 807 Mill Road  
Lewiston, ID 83501

**Permit Authority**

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules) (IDAPA 58.01.01.300-386) (b) incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210 and the permittee elects not to incorporate those terms and conditions into this operating permit.

The permittee shall comply with the terms and conditions of this permit. The effective date of this permit is the date of signature by DEQ on this cover page.

**Date Issued** March 26, 2014

**Date Expires** July 24, 2018



Shawnee Chen, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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# 1 Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
COMS	continuous opacity monitoring systems
DEQ	Idaho Department of Environmental Quality
dscf	dry standard cubic feet
EPA	United States Environmental Protection Agency
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
mbf	thousand board feet
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PTC	permit to construct
PW	process weight rate
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIP	State Implementation Plan
T/yr	tons per consecutive 12-calendar-month period
T1	Tier I operating permit
U.S.C.	United States Code
VOC	volatile organic compound

## 2 Permit Scope

### Purpose

- 2.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the Rules.
- 2.2 This Tier I operating permit incorporates the following permit:
- Permit to Construct No. P-2011.0135 project 61240, issued March 18, 2014
- 2.3 This Tier I operating permit supersedes the following permit:
- Tier I Operating Permit No. T1-2012.0038 project 61078, issued July 24, 2013

### Regulated Sources

Table 2.1 lists all sources of regulated emissions in this permit.

**Table 2.1. REGULATED SOURCES**

Permit Section	Source	Control Equipment
4	4 Double-Track kilns – manufactured by Wellons 2 Double-Track kilns – manufacturer to be determined	None
5	Debarking, cutoff saws 27-inch, 35-inch, and 50-inch debarkers 27-inch, 35-inch cutoff saws	Reasonable control
	Main sawmill	Cyclones (process equipment)
	Small log line	Sawmill baghouse
	Planer mill	Chips cyclone (process equipment) followed by a chips baghouse
		Shavings cyclone (process equipment) followed by a shavings baghouse
Fuel hog	Fuel hog cyclone (process equipment)	

[PTC No. P-2011.0135, 3/18/14]

### 3 Facility-Wide Conditions

Table 3.1 contains a summary of requirements that apply generally to emissions units at the facility.

**Table 3.1. APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Limit / Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
3.1	Fugitive Dust	Reasonable control	IDAPA 58.01.01.650–651	3.2-3.4, 3.21, 3.26
3.5	Odors	Reasonable control	IDAPA 58.01.01.775–776	3.6, 3.21
3.7	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.8-3.9, 3.21, 3.26
3.10-3.14	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130–136	3.10-3.14, 3.21, 3.26
3.15	Sulfur Content	ASTM grade No. 1 fuel oil ≤ 0.3% by weight ASTM grade No. 2 fuel oil ≤ 0.5% by weight	IDAPA 58.01.01.725	3.16, 3.21, 3.26
3.17	Open Burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600–623	3.17, 3.21, 3.26
3.18	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	3.18, 3.21, 3.26
3.19	Accidental Release Prevention	Compliance with 40 CFR 68	40 CFR 68	3.19, 3.21, 3.26
3.20	Recycling and Emission Reduction	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	3.20, 3.21, 3.26
3.21	Monitoring and Recordkeeping	Maintenance of required records	IDAPA 58.01.01.322.06,07	3.21, 3.26
3.22-3.25	Testing	Compliance testing	IDAPA 58.01.01.157	3.22-3.25, 3.21, 3.26
3.26	Reports and Certifications	Submittal of required reports, notifications, and certifications	IDAPA 58.01.01.322.08	3.26

#### Fugitive Dust

**3.1** All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651.

[IDAPA 58.01.01.650–651, 3/30/07]

**3.2** The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive emissions.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

**3.3** The Permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving 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.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 3.4 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.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

### **Odors**

- 3.5 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.

[IDAPA 58.01.01.775-776 (state only), 5/1/94]

- 3.6 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.

[IDAPA 58.01.01.322.06, 07 (state only), 5/1/94]

### **Visible Emissions**

- 3.7 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<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

- 3.8 For all sources that are not listed in Table 5.2 of this permit the permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

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

or

- b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions 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.

[IDAPA 58.01.01.322.06, 5/1/94]

- 3.9 The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.07, 5/1/94]

## **Excess Emissions**

### ***Excess Emissions—General***

- 3.10 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 facility-wide conditions for excess emissions (Permit Conditions 3.11 through 3.14) 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.

[IDAPA 58.01.01.132, 4/5/00]

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

- 3.11 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 the occurrence of any scheduled startup, shutdown, or maintenance resulting in excess emissions 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 the excess emissions reporting and recordkeeping requirements (Permit Conditions 3.13 and 3.14) and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133, 4/11/06]

### ***Excess Emissions—Upset, Breakdown, or Safety Measures***

- 3.12 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 the excess emissions reporting and recordkeeping facility-wide conditions (Permit Conditions 3.13 and 3.14) 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.

[IDAPA 58.01.01.134, 4/11/06]

### ***Excess Emissions—Reporting and Recordkeeping***

**3.13** 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.

[IDAPA 58.01.01.135, 4/11/06]

**3.14** 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.

[IDAPA 58.01.01.136, 4/5/00]

### **Sulfur Content**

**3.15** The permittee shall not sell, distribute, use, or make available for use any of the following:

- 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

[IDAPA 58.01.01.725, 3/29/10]

**3.16** The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as-received basis.

[IDAPA 58.01.01.322.07, 5/1/94]

### **Open Burning**

**3.17** The permittee shall comply with the “Rules for Control of Open Burning” (IDAPA 58.01.01:600–623).

[IDAPA 58.01.01.600–623, 5/08/09]

## **Asbestos**

### **3.18 NESHAP 40 CFR 61, Subpart M—National Emission Standard for Asbestos**

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M—“National Emission Standard for Asbestos.”

[40 CFR 61, Subpart M]

## **Accidental Release Prevention**

**3.19** A permittee of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the “Chemical Accident Prevention Provisions” at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

## **Recycling and Emissions Reductions**

### **3.20 40 CFR Part 82—Protection of Stratospheric Ozone**

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, “Recycling and Emissions Reduction.”

[40 CFR 82, Subpart F]

## **Monitoring and Recordkeeping**

**3.21** The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating 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 supporting 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 58.01.01.322.06, 07, 5/1/94]

## **Performance Testing**

**3.22** If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

**3.23** All 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, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

**3.24** Unless a longer time is approved by DEQ, the permittee shall submit a compliance test report for the respective test to DEQ within 60 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

**3.25** The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the "Reports and Certifications" facility-wide condition (Permit Condition 3.26).

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

## Reports and Certifications

**3.26** All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130–136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance  
Department of Environmental Quality  
Lewiston Regional Office  
1118 F Street  
Lewiston, ID 83501  
Phone: (208) 799-4370  
Fax: (208) 799-3451

The periodic compliance certification required in the general provisions (General Provision 7.22) shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10  
Air Operating Permits, OAQ-107  
1200 Sixth Ave.  
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 4/5/00]

## Compliance Assurance Monitoring (CAM), 40 CFR Part 64

**3.27** In accordance with 40 CFR 64.5(b), the permittee shall submit the information required under 40 CFR 64.4 as part of an application for the renewal of this Tier I operating permit that expires on July 24, 2018.

[40 CFR 64.5(b)]

## 4 Lumber Drying Kilns

### Summary Description

The lumber drying kilns process green rough cut lumber of various wood species and dimensions by reducing the moisture content in the lumber. Process steam is supplied to IFG Lewiston by the Clearwater Paper Corporation Pulp and Paper Division. The steam is supplied to heating coils within the kilns which transfer heat to the stacked lumber to drive off the desired amount of moisture. Fans inside the kilns circulate the heated air inside the kilns, and vents in the roof of each kiln are opened and closed to maintain the desired conditions within the kiln.

Emissions from the lumber drying kilns are uncontrolled.

Table 4.1 contains only a summary of the requirements that apply to the lumber drying kilns. Specific permit requirements are listed below Table 4.1.

**Table 4.1 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
3.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	3.8
4.1.1	VOC	249 T/yr	PTC No. P-2011.0135, issued 3/18/14	4.5, 4.6
4.1.2	PM <sub>2.5</sub>	0.33 lb/hr from each drying kiln	PTC No. P-2011.0135, issued 3/18/14	4.3, 4.7
4.2	Lumber throughput	470,000 mbf/yr	PTC No. P-2011.0135, issued 3/18/14	4.4
4.3	Western Hemlock by volume	10% or less	PTC No. P-2011.0135, issued 3/18/14	4.7

### Emission Limits

#### 4.1 Emission Limits

4.1.1 The combined VOC emissions from the six drying kiln vents shall not exceed 249 tons per any consecutive 12-calendar-month period.

[PTC No. P-2011.0135, 3/18/14]

4.1.2 The maximum 24-hour averaged emissions from each drying kiln shall not exceed 0.33 lb/hr for PM<sub>2.5</sub>.

[PTC No. P-2011.0135, 3/18/14]

### Operating Requirements

#### 4.2 Throughput Limit

The throughput of lumber for the drying kilns shall not exceed 470,000 thousand board feet (mbf) during any consecutive 12-month period.

[PTC No. P-2011.0135, 3/18/14]

**4.3 Operational Limit on Western Hemlock**

The permittee shall not dry Western Hemlock except for Western Hemlock in the Hem-Fir group that consists of Grand Fir, White Fir, Alpine Fir, and 10% or less by volume of Western Hemlock.

[PTC No. P-2011.0135, 3/18/14]

**Monitoring and Recordkeeping Requirements**

4.4 Each month, the permittee shall monitor and record the total throughput of all species of lumber processed in the drying kilns in units of thousand board feet (mbf) for that month and for the most recent consecutive 12-month period.

[PTC No. P-2011.0135, 3/18/14]

4.5 To demonstrate compliance with the VOC emission limit each month the permittee shall monitor and record the throughput of each of the following types of lumber to the kilns in thousand board feet (mbf/month), and each month the permittee shall record the throughput during the previous consecutive 12 month period (mbf/consecutive 12 month period):

Ponderosa Pine;

Englemann Spruce, Lodge Pole Pine & other spruce (aggregated);

Douglas Fir;

Hem-Fir (Western Hemlock, Grand Fir, White Fir, Alpine Fir-aggregated)

Cedar and Redwood (aggregated); and

Any other species dried (aggregated).

[PTC No. P-2011.0135, 3/18/14]

4.6 To demonstrate compliance with VOC emission limit, each month the permittee shall calculate and record the amount of VOC emissions from the drying kilns during previous consecutive 12-month period using the emission factors listed in Table 4.2 or use DEQ-approved alternative.

**Table 4.2 EMISSIONS FACTORS**

Lumber Type	VOC (lb/mbf) <sup>1</sup>
Ponderosa Pine & other species not listed below	4.43
Engelmann Spruce/Lodgepole Pine & other spruce	2.16
Douglas Fir	1.70
Hem-Fir (Western Hemlock, Grand Fir, White Fir, Alpine Fir)	1.09
Cedar and Redwood	1.15

1) Pounds per thousand board feet.

[PTC No. P-2011.0135, 3/18/14]

4.7 Each month, the permittee shall record the maximum volume percentage of Western Hemlock in Hem-Fir group and state in the records that the permittee complies with Permit Condition 4.3 Operational Limit on Western Hemlock for that month.

[PTC No. P-2011.0135, 3/18/14]

## 5 Sawmill, Planer Mill and Material Handling Equipment

### Summary Description

#### Sawmill

Through main sawmill or small log line, the debarked logs are cut to maximize the amount of lumber obtained from each log.

The existing main sawmill is under a negative pressure resulting from the sawmill cyclones. Sawdust and wood residuals from the main sawmill are handled by the three sawmill cyclones (CY1, CY2A and CY2B). CY1 exhausts to one stack, and CY2A and CY2B exhaust to another stack.

The materials collected in the three sawmill cyclones are re-entrained and transported either to Bruks chipper cyclone as an intermediate cyclone (CY3) that vents to the chips baghouse (BH-2), or directly to the chips baghouse (BH-2).

The small log line will allow processing of smaller logs and will be housed in a new building or an addition to the existing main sawmill building, which will be under negative pressure from the cyclones and/or small log line baghouse (BH3). The small log line baghouse will transport sawdust and wood residuals from the small log line and will be located on the south side of the sawmill building(s).

Chips from the main sawmill and small log line drop to the Chip Conveyor and are conveyed to an off-site wood pile.

#### Planer mill

Dried lumber is removed from the kilns and either stored temporarily or sent to the planer mill building where the lumber is trimmed by saws, planed, sorted, stacked, strapped, and stored before shipment.

A new planer shavings material handling cyclone (CY4) will be installed on top of the truck bins at the new location. Emissions from the planer shavings cyclone will be routed to an emissions control baghouse (BH-1.)

Planer chips are transported through Bruks chipper cyclone that vents to the chips baghouse (BH-2). Chips collected by Bruks chipper cyclone (CY3) drop onto chip conveyor and are conveyed to an off-site wood pile.

#### Fuel Hog

The Fuel Hog is used to chop waste materials (e.g., wood waste) into smaller pieces for use as boiler fuel. The Fuel Hog emission point is a cyclone which is used to pneumatically transfer the hogged fuel to an off-site fuel pile.

Table 5.1 describes the devices used to control emissions from the sawmill, planer mill, and material handling equipment

**Table 5.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emissions Units / Processes	Control Devices
Debarking, cutoff saws 27-inch, 35-inch, and 50-inch debarkers 27-inch, 35-inch cutoff saws	Reasonable control

Emissions Units / Processes	Control Devices
Main sawmill	Cyclones
Small log line	Sawmill baghouse
Planer mill	Chips cyclone followed by a chips baghouse
	Shavings cyclone followed by a shavings baghouse
Fuel hog	Fuel hog cyclone

[PTC No. P-2011.0135, 3/18/14]

## **Emission Limits**

### **5.1 Process Weight Rate Prior to October 1, 1979**

No person shall discharge PM to the atmosphere from any process or process equipment commencing operation prior to October 1, 1979, in excess of the amount shown by the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 17,000 lb/hr,  

$$E = 0.045(PW)^{0.6}$$
- b. If PW is equal to or greater than 17,000 lb/hr,  

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

### **5.2 Process Weight Rate after October 1, 1979**

No person shall discharge PM to the atmosphere from any process or process equipment operating on or after October 1, 1979, in excess of the amount shown by the following equations, where E is the allowable emissions from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

- a. If PW is less than 9,250 lb/hr,  

$$E = 0.045(PW)^{0.6}$$
- b. If PW is equal to or greater than 9,250 lb/hr,  

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]

## **Operating Requirements**

### **5.3 Main Sawmill**

The permittee shall install and operate the cyclones (CY1 and CY2A and CY2B) at all times when the main sawmill is operated to control emissions from the main sawmill as described under summary description of this section.

[PTC No. P-2011.0135, 3/18/14]

#### 5.4 Small Log Line

- The permittee shall install and operate a baghouse (BH-3) at all times when the small log line is operated to control PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the small log line as described under summary description of this section.
- The PM<sub>10</sub> emissions concentration from the small log line baghouse shall not exceed 0.003 grain per cubic feet.

[PTC No. P-2011.0135, 3/18/14]

#### 5.5 Chips Baghouse

The permittee shall install and operate a baghouse (BH-2) at all times when the planer mill is operated to control PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the chips cyclone as described under summary description of this section.

[PTC No. P-2011.0135, 3/18/14]

#### 5.6 Shavings Baghouse

The permittee shall install and operate a baghouse (BH-1) at all times when the planer is operated to control PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the shavings cyclone as described under summary description of this section.

[PTC No. P-2011.0135, 3/18/14]

### **Monitoring and Recordkeeping Requirements**

#### 5.7 Sawmill Cyclones and Fuel Hog Cyclone

The permittee shall inspect each cyclone as listed in Table 5.1 every six months. The inspection shall be to assure that the cyclone is not plugged, eroded or otherwise not functioning as designed. The permittee shall maintain records of the inspections and any maintenance conducted.

[PTC No. P-2011.0135, 3/18/14]

#### 5.8 Baghouse/Filter System Procedures

For each baghouse (i.e., BH-1, BH-2, and BH-3), within 60 days of initial start-up, the permittee shall have developed a Baghouse System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from each respective emissions unit. The Baghouse/Filter System Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse/Filter System Procedures document shall describe the procedures that will be followed to comply with General Provision 2 of the underlying PTC and shall contain requirements for monthly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

General Provision 2 of the underlying PTC

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.

The Baghouse/Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at any time. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The Permittee shall maintain records of the results of each baghouse/filter system inspection in accordance with Permit Condition 3.21. The records shall include, but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse/Filter System Procedures document shall be submitted to DEQ by May 17, 2014 for review and comment and shall contain a certification by a responsible official. Any changes to the Baghouse/Filter System Procedures document shall be submitted within 15 days of the change.

The Baghouse/Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring and recordkeeping requirements specified in the Baghouse/Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

The permittee shall keep documentation (e.g., manufacturer's specifications) on-site showing that PM<sub>10</sub> emissions concentration of the small log line baghouse is 0.003 grain per cubic feet or less.

[PTC No. P-2011.0135, 3/18/14]

## 5.9 Eliminated Emissions Sources

The following emissions sources shall be eliminated:

- Three existing planer shavings material handling baghouses (IFGBH1, IFGBH2, and IFGBH3.)
- The cyclone (IFGCY1) associated with the #4 splitter with the planer mill
- The truck bin cyclones (IFGCY6, IFGCY7 and IFGCY8) and the truck bin baghouse (IFGBH4.)
- Cedar Products processing

[PTC No. P-2011.0135, 3/18/14]

## 6 General Provisions

### General Compliance

- 6.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.  
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
- 6.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.  
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
- 6.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.  
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

### Reopening

- 6.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.  
[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]
- 6.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

### Property Rights

- 6.6 This permit does not convey any property rights of any sort or any exclusive privilege.  
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

### Information Requests

- 6.7 The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.  
[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]
- 6.8 Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.  
[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

## Severability

- 6.9 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)]

## Changes Requiring Permit Revision or Notice

- 6.10 The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200–223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380–386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15); 40 CFR 70.7(d), (e)]

- 6.11 Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the Clean Air Act (CAA), 42 United States Code (U.S.C.) Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381–385, 4/5/00; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14), (15)]

## Federal and State Enforceability

- 6.12 Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1), (2)]

- 6.13 Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

## Inspection and Entry

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

- Enter upon the permittee's premises where a Tier I source is located, or 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; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

### **New Applicable Requirements**

- 6.15** The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

### **Fees**

- 6.16** The permittee shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

### **Certification**

- 6.17** All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

### **Renewal**

- 6.18** The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the permittee is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

- 6.19** If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit, including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325, shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

### **Permit Shield**

- 6.20** Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:

- Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
- The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;
- The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
- The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 5/1/94;  
IDAPA 58.01.01.325, 3/19/99; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99;  
40 CFR 70.6(f)]

## Compliance Schedule and Progress Reports

6.21 The permittee shall comply with the following:

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00;  
40 CFR 70.6(c)(3) and (4)]

## Periodic Compliance Certification

6.22 The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:

- The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
- The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit, including emissions limitations, standards, and work practices;
- The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
  - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
  - The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
  - The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means

designated in Subsection 322.11.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and

- Such information as DEQ may require to determine the compliance status of the emissions unit.

**6.23** All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

### **False Statements**

**6.24** 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]

### **No Tampering**

**6.25** 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]

### **Semiannual Monitoring Reports**

**6.26** In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

### **Reporting Deviations and Excess Emissions**

**6.27** The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130–136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

### **Permit Revision Not Required**

**6.28** No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

## **Emergency**

**6.29** In accordance with IDAPA 58.01.01.332, an "emergency," as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

**[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]**