

Statement of Basis

**Permit to Construct P-2010.0042
Project No. 60912**

**Plummer Forest Products, Inc.
Post Falls, Idaho**

Facility ID No. 055-00018

 **Final**

**December 12, 2011
Eric Clark
Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CBP	concrete batch plant
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CMS	continuous monitoring systems
CO	carbon monoxide
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
gpm	gallons per minute
gph	gallons per hour
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HMA	hot mix asphalt
hp	horsepower
hr/yr	hours per year
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance

PAH	polyaromatic hydrocarbons
PC	permit condition
PCB	polychlorinated biphenyl
PERF	Portable Equipment Relocation Form
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
RAP	recycled asphalt pavement
RFO	reprocessed fuel oil
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SCL	significant contribution limits
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per consecutive 12-calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TEQ	toxicity equivalent
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compounds
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

Plummer Forest Products, Inc., Post Fall's facility manufactures particleboard from wood shavings and resin. Trucks deliver and dump wood shavings in one of two storage buildings. A drag chain feeds the wood shaving to milling machines, which process the wood shavings into furnish. The furnish is dried in a rotary dryer and temporarily stored in the outside dry silo. Furnish from the outside dry silo and sanderdust is then passed through a weigh system to either the #1 small blender and main blender, or the #2 small blender. In the blenders, resin is mixed with the sanderdust and furnish. The mix is conveyed to a former where the mix takes the shape of a mat approximately the size of a 4' X 8' particleboard panel. The mats are pressed by the particleboard press, allowed to cool, cut to size, and sanded. Scrap from the saw line is processed back into furnish. Sanderdust generated by the process is stored, used for the manufacturing process or as fuel for the facility's Kipper and Sons boiler, or sold. The Kipper and Sons boiler provides steam heat for the process and plant make-up air.

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

April 22, 2010	P-2010.0042, Ownership Change, Permit status (A, but will become S upon issuance of this permit)
September 23, 2005	P-050104, Installing equipment to recover sanderdust and establishing federally enforceable HAP limits to be an HAP area source, Permit Status (S).
August 17, 2001	P-010101 (055-00018), Installation of press cure monitor, rotary particle dryer replacement, and production increase, Permit Status (S). Included as part of the May 22, 2001 PTC
May 22, 2001	P-000115 (055-000018), PTC for installation of press cure monitor and production increase, Permit Status (S).
February 1, 1985	0860-0018, PTC for installing wood chip pre-dryer and associated equipment., Permit Status (S). According to the information in the technical memorandum for the initial Tier I issued on 8/28/02, the equipment was never installed.
November 25, 1980	PTC Letter, PTC for installation of a wood dryer, Permit Status (S). According to the information in the technical memorandum for the initial Tier I issued on 8/28/02, the equipment was never installed.
January 10, 1974	PTC Letter, Initial PTC for constructing the facility, Permit Status (A).

Application Scope

This PTC is for a revision at an existing Tier I facility. See the current Tier I permit statement of basis for the permitting history.

The applicant has proposed to:

- Revise language of Tables 1.1 and 2.1, now Tables 1 and 2.
- Remove pressure drop monitoring and recordkeeping requirements.

Performance Testing schedules have been updated and the pressure drop requirements has been replaced with a baghouse Maintenance Procedures document permit condition. This document is to be submitted to DEQ for approval outlining how all control equipment will be operated and maintained. Visible emission inspections are also included.

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625

Visible Emissions

The sources of PM₁₀ emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 8.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301

Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for VOC or as demonstrated previously in the Emissions Inventories Section of an analysis, September 23, 2005. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52.21(b)(1). Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements. Note that both 40 CFR 60, Subpart Dc discussion is described in detail in the Statement of Basis of the T1 Operating Permit, T1-2011.0115

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

The facility has proposed to operate as a minor source of hazardous air pollutant (HAP) emissions, and is not subject to the requirements of 40 CFR 63, Subpart DDDD–National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products.

40 CFR 63, Subpart DDDD

**National Emission Standards for Hazardous Air Pollutants:
Plywood and Composite Wood Products**

§ 63.2230

What is the purpose of this subpart?

This subpart establishes national compliance options, operating requirements, and work practice requirements for hazardous air pollutants (HAP) emitted from plywood and composite wood products (PCWP) manufacturing facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the compliance options, operating requirements, and work practice requirements.

This subpart applies to you if you meet the criteria in paragraphs (a) and (b) of this section.

(a) You own or operate a PCWP manufacturing facility. A PCWP manufacturing facility is a facility that manufactures plywood and/or composite wood products by bonding wood material (fibers, particles, strands, veneers, etc.) or agricultural fiber, generally with resin under heat and pressure, to form a structural panel or engineered wood product. Plywood and composite wood products manufacturing facilities also include facilities that manufacture dry veneer and lumber kilns located at any facility. Plywood and composite wood products include, but are not limited to, plywood, veneer, particleboard, oriented strandboard, hardboard, fiberboard, medium density fiberboard, laminated strand lumber, laminated veneer lumber, wood I-joists, kiln-dried lumber, and glue-laminated beams.

(b) The PCWP manufacturing facility is located at a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (10 tons) or more per year or any combination of HAP at a rate of 22.68 megagrams (25 tons) or more per year.

Plummer Forest Products, Inc. is not a major source for HAPs as the facility is limited to less than 10 and 25 T/yr. Therefore, they are not applicable to the Subpart.

Note that both 40 CFR 63, Subparts ZZZZ and JJJJJ discussions are described in detail in the Statement of Basis of the T1 Operating Permit, T1-2011.0115.

Permit Conditions Review

This section describes the permit conditions for this revised permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Existing Permit Condition 1.3

The emission sources regulated by this permit are listed in the following table.

Table 1.1 SUMMARY OF REGULATED SOURCES

<i>Permit Section</i>	<i>Source Description</i>	<i>Emissions Control(s)</i>
2	Drag Chain	Drag Chain Baghouse BH-1
2	Rotex Screens #1, #2; Hammermills	Hammermill Cyclone Baghouse BH-3A
2	Blender, Former	Scalper Air System Baghouse BH-5, Outside Silo High Pressure Air System Baghouse BH-5A
2	Board Cooler, Process Fugitives, Rip & Trim Saws	East Sawline Baghouse BH-10A, West Sawline Baghouse BH-10
2	Board Trim Hog	Reclaim Baghouse BH-3
2	Sanderdust Storage Silo	Sanderdust Storage Silo Baghouse BH-6
2	Sander	Sander Air System Baghouse BH-7
2	Boiler Fuel Overs	Sanderdust Overs Baghouse
2	Boiler	Electrostatic Precipitator
2	Particle Dryer	Multiclone
2	Press	None

Revised Permit Condition 4

The emission sources regulated by this permit are listed in the following table.

Table 1 REGULATED SOURCES

<i>Source Descriptions</i>	<i>Emission Controls</i>
<i>Drag Chain and Drag Chain Baghouse BH-1</i>	<i>None</i>
<i>Rotex Screens #1, #2; Hammermills, Hammermill Cyclone and Baghouse BH-2</i>	<i>None</i>
<i>Outside Dry Silo</i>	<i>Outside Silo High Pressure Air System Baghouse BH-4</i>
<i>Blender, Former and Scalper Air System Baghouse BH-5</i>	<i>None</i>
<i>Board Cooler; Process Fugitives, Rip and Trim Saws</i>	<i>East Sawline Baghouse BH-9 West Sawline Baghouse BH-10</i>
<i>Board Trim and Reclaim Baghouse BH-3</i>	<i>None</i>
<i>Sanderdust Storage Silo</i>	<i>Sanderdust Storage Silo Baghouse BH-6</i>
<i>Sander Air System Baghouse BH-7</i>	<i>None</i>
<i>Sanderdust Overs Baghouse BH-8</i>	<i>None</i>
<i>Boiler</i>	<i>Electrostatic Precipitator</i>
<i>Particle Dryer</i>	<i>Multiclone</i>
<i>Press</i>	<i>None</i>

The Regulated Sources Table has been updated at the request of the permittee to incorporate the correct emission control devices for the proper emissions unit. Some of the controls have been removed because they were determined to be process equipment. See Appendix C for details.

Existing Permit Condition 2.2

Emissions from the hammermill and Rotex screens are controlled by hammermill cyclone baghouse BH-3A. Emissions from the board trim hog are controlled by reclaim baghouse BH-3. The hammermill cyclone baghouse and reclaim baghouse vent to a single stack, the hammermill baghouse/reclaim baghouse stack. Emissions from the blender and former are controlled by scalper air system baghouse BH-5 and outside silo high pressure air system baghouse BH-5A. Both baghouses vent to through the scalper baghouse stack. Table 2.1 lists the emission units, their emission control device, and their emissions point.

Table 2.1 PARTICLEBOARD MANUFACTURING DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Drag Chain	Drag Chain Baghouse BH-1	Drag Chain Baghouse Stack
Rotex Screens #1, #2; Hammermills	Hammermill Cyclone Baghouse BH-3A	Hammermill Baghouse/ Reclaim Baghouse Stack
Blender, Former	Scalper Air System Baghouse BH-5, Outside Silo High Pressure Air System Baghouse BH-5A	Scalper Baghouse Stack
Board Cooler, Process Fugitives, Rip & Trim Saws	East Sawline Baghouse BH-10A, West Sawline Baghouse BH-10	East/West Sawline Baghouses' Stack
Board Trim Hog	Reclaim Baghouse BH-3	Hammermill Baghouse/ Reclaim Baghouse Stack
Sanderdust Storage Silo	Sanderdust Storage Silo Baghouse BH-6	Sanderdust Storage Silo Stack
Sander	Sander Air System Baghouse BH-7	Sander Air System Baghouse
Boiler Fuel Overs	Sanderdust Overs Baghouse	Sanderdust Overs Baghouse Tack
Boiler	Electrostatic Precipitator	Electrostatic Precipitator Stack
Particle Dryer	Multiclone	Particle Dryer Multiclone Stack
Press	None	North, East, & West Press Vents

Revised Permit Condition 6

Emissions from the Outside Dry Silo are controlled by the Outside Silo High Pressure Air System Baghouse. Emissions from the Sanderdust Storage Silo are controlled by the Sanderdust Storage Silo Baghouse. Emissions from the sawline are controlled by the East and West Sawline Baghouses, which vent through a common stack. Emissions from the boiler are controlled by an electrostatic precipitator (ESP) and emissions from the Particle Dryer are controlled by the multiclone. The Press Vents do not have emissions controls.

Table 2 PARTICLEBOARD MANUFACTURING DESCRIPTION

<i>Emissions Units / Processes</i>	<i>Emission Control Devices</i>	<i>Emission Points</i>
<i>Drag Chain and Drag Chain Baghouse BH-1</i>	<i>None</i>	<i>Drag Chain Baghouse Stack</i>
<i>Rotex Screens #1, #2; Hammermills, Hammermill Cyclone and Baghouse BH-2</i>	<i>None</i>	<i>Hammermill Baghouse Vent</i>
<i>Outside Dry Silo</i>	<i>Outside Silo High Pressure Air System Baghouse BH-4</i>	<i>Scalper Baghouse Vent</i>
<i>Blender, Former and Scalper Air System Baghouse BH-5</i>	<i>None</i>	<i>Scalper Baghouse Stack</i>
<i>Board Cooler; Process Fugitives, Rip and Trim Saws</i>	<i>East Sawline Baghouse BH-9 West Sawline Baghouse BH-10</i>	<i>East/West Sawline Baghouse' Stack</i>
<i>Board Trim and Reclaim Baghouse BH-3</i>	<i>None</i>	<i>Hammermill Baghouse/Reclaim Baghouse Stack</i>
<i>Sanderdust Storage Silo</i>	<i>Sanderdust Storage Silo Baghouse BH-6</i>	<i>Sanderdust Storage Silo Baghouse Vent</i>
<i>Sander Air System Baghouse BH-7</i>	<i>None</i>	<i>Sanderdust Air System Baghouse Vent</i>
<i>Sanderdust Overs Baghouse BH-8</i>	<i>None</i>	<i>Sanderdust Overs Baghouse Vent</i>
<i>Boiler</i>	<i>Electrostatic Precipitator</i>	<i>Electrostatic Precipitator Stack</i>
<i>Particle Dryer</i>	<i>Multiclone</i>	<i>Particle Dryer Multiclone Stack</i>
<i>Press</i>	<i>None</i>	<i>North, East and West Press Vents</i>

The table has been updated at the request of the permittee to incorporate the correct emission control devices for the proper emissions unit. Some of the controls have been removed because they were determined to be process equipment.

Existing Permit Condition 2.3

- *By no later than June 30, 2007, facility-wide HAP emissions shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.*
- *By no later than June 30, 2007, facility-wide HAP emissions shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.*

Revised Permit Condition 7

- *Facility-wide HAP emissions shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.*
- *Facility-wide HAP emissions shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.*

The requirement date has passed and is no longer relevant; therefore it was removed. The facility has been meeting this requirement.

Existing Permit Condition 2.5

The permittee shall conduct a performance test to measure formaldehyde, methanol, and total HAP emissions from the press vents and East & West Sawline baghouses in accordance with the procedures outlined in Table 2.3, or a DEQ-approved alternative method, no later than June 30, 2007. Total hazardous air pollutant emissions means, as defined by 40 CFR 63.2292, the sum of the emissions of the following six compounds: acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde. The performance test shall be used to develop emission factors for formaldehyde, methanol, and total HAP emissions from the press vents and East & West Sawline baghouses in order to demonstrate compliance with the emission rate limit listed in Permit Condition 2.3.

Table 2.3 Performance Test Methods

Pollutant	Performance Test Method
Formaldehyde	Method 0011 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA Publication No. SW-846) for formaldehyde; OR the NCASI Method CI/WP-98.01 (IBR, see §63.14(f)); OR the NCASI Method IM/CAN/WP-99.02 (IBR, see § 63.14(f)).
Methanol	Method 308 in appendix A to 40 CFR part 63; OR Method 320 in appendix A to 40 CFR part 63; OR the NCASI Method CI/WP-98.01 (IBR, see § 63.14(f)); OR the NCASI Method IM/ CAN/WP-99.02 (IBR, see § 63.14(f)).
Total HAP	Method 320 in appendix A to 40 CFR part 63; OR the NCASI Method IM/CAN/WP-99.02 (IBR, see § 63.14(f)); OR ASTM D6348-03 (IBR, see § 63.14(b)) provided that percent R in Annex A5 of ASTM D6348- 03 is equal or greater than 70% and less than or equal to 130%.

During the performance test, the manufacturing process shall be operated at a minimum of 90% of the maximum furnish usage rate.

Revised Permit Condition 10

No change shall be made to any non-wood additive such as resins, glue and any other adhesive associated with the press or sawline unless a new additive qualifies for exemption in accordance with IDAPA 58.01.01.223.

The testing requirement was removed because the one-time test was performed and accepted by DEQ. The results of the performance test are now being used as emission factors to establish HAPs emissions from the sawline and press vents. Assuming the current process for these units do not change and create an increase in emissions, the emission factors from the 2007 Performance Team are valid. This new condition reminds/requires PFP that should there be a change in the mode of operation that triggers a modification, PTC application or exemption determination needs to be submitted to DEQ. At which time, updated emission factors and/or performance test requirements will be revisited. The restriction to current additives was included to verify that any new resins added into the process were either exempted per 223 or a new permit modification was necessary. 223 requires that any current TAP incremental increase or a newly introduced TAP is below the Screening Emission Level. If they are not, a permit modification is required. Any new resin may not be representative of the emissions assumed in the application submitted for the previous permit, issued September 23, 2005. That was the permit that required the performance testing for formaldehyde, methanol and Total HAPs.

Removed Permit Conditions 2.7, 2.8 and 2.11

The pressure differential across each emission control device listed in Table 2.1, Permit Condition 2.2, shall be maintained within manufacturer and O&M manual recommendations and specifications.

Within 60 days after startup, the permittee shall have developed an O&M manual for the emission control devices listed in Table 2.1, Permit Condition 2.2, which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and made available to DEQ representatives upon request.

When operating, the permittee shall monitor and record once per day, the pressure differential across each emission control device listed in Table 2.1, Permit Condition 2.2, to demonstrate compliance with Permit Conditions 2.7 and 2.8.

These conditions were removed at the permittee's request. Pressure drop differential is not necessarily the best method to establish how well the baghouse is operating. In place of pressure differential, a baghouse procedures document will be required (See Permit Condition 13).

New Permit Condition 13

Within 60 days of permit issuance, the permittee shall have developed a Control System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from the baghouses, transfer point boots/enclosures, and the transfer point water sprays. The Control 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 Control System Procedures document shall describe the procedures that will be followed to comply with the maintenance General Provision and shall contain requirements for weekly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Control 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.*
- *Air to Cloth Ratio Certification*

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

- *Procedures to determine if spray bar is functioning properly; and*
- *Procedures to determine if water spray bar is appropriate for the application and secured in place.*

The Control System Procedures document shall also include, at a minimum, the following methodology used by the facility to handle fugitive dust emissions:

- *Use, where practical, of water, or chemical dust suppressant, for control of dust generated as a result of material handling or processing;*
- *Application of water, or chemical dust suppressant, by hardpiped, conical deluge, or mist, application systems, or equivalent;*
- *Application and use, where practical and as specified in the application materials, of shrouding of material transfer points;*

- *Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Containment methods shall be employed during mixing or drop operations;*

The permittee shall maintain records of the results of each control system inspections in accordance with Recordkeeping General Provision. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The Control System Procedures document shall be submitted to DEQ within 60 days of permit issuance to remain on file and shall contain a certification by a responsible official. A copy shall also remain on site. Any permittee or DEQ requested changes to the Control System Procedures document shall be submitted within 15 days of the change.

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

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

The operating and monitoring requirements specified in the Control System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

This condition is now standard language throughout the majority of IDEQ permits that include baghouses. Within 60 days of startup, the permittee needs to develop a procedures document outlining operations and maintenance schedules. This procedure must be submitted to the appropriate regional DEQ office for review. This is to demonstrate that all required control equipment is being operated and maintained properly. Also any change whether it is done by the facility or requested by DEQ must be submitted to DEQ within 15 days of the change.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.

Public Comment Period

A public comment period was made available to the public in accordance with IDAPA 58.01.01.209.05.b. During this time, comments were not submitted in response to DEQ's proposed action. Refer to the chronology for public comment period dates.

APPENDIX A – FACILITY DRAFT COMMENTS

The following comments were received from the facility on October 20, 2011:

Facility Comment #1: Ongoing HAP Source Testing Requirement, PTC Condition 10

The previous PTC Permit Condition 2.5 required the former owners, Potlatch Forest Products Corporation (PFPC), to perform a one-time testing campaign to establish HAPs emissions factors for the press vents and sawline baghouses. The purpose of the required HAP source testing was to establish emission factors for use in determining compliance with facility-wide HAP emission limits.

The required testing was completed on January 16-17, 2007 and was approved by IDEQ on May 18, 2007. Results of the DEQ review of the HAP emission factor development testing are presented in the attached letter from IDEQ to PFPC. PFPC understood at the time of the testing, that the emission factor development testing would only need to be performed once.

The current facility draft PTC permit converts the one-time emissions factor development testing requirement into an on-going compliance testing requirement. PFP requests that the ongoing HAP testing requirement contained in PTC Condition 10 be eliminated.

PFP does expect that the HAP emission factors for the press vents or sawline baghouses will change over time. The primary source of HAP emissions in particleboard manufacture is wood heating and drying, which remains constant. The AP-42 and NCASI emission factors that are in common use throughout the industry have not been updated for years, so there is no reason the think the on-site emission factors need regular updating.

DEQ Response #1: PTC Condition 10 has been modified. DEQ has concluded that the concern of HAP emissions was related to a potential change or increase in HAP emissions associated with a change in operation of the press and sawline. The current emission factors used for demonstrating compliance with the 10 and 25 tpy HAP emission limits are valid under the operating methods used today. Should there be a future change in operation that results in an emission increase, a modification or exemption determination would be triggered in accordance with the State Air Rules. Therefore, the concern of DEQ will be addressed in any future permitting action. Thus, there is no need for future testing at this time. Note that emission factors and potential performance testing may be addressed during the next permitting action where warranted.

Facility Comment #2: Minor Items on PTC Technical Analysis

PFP asks that references to the ongoing HAP testing on pages 5 and 6 of the PTC technical analysis be updated to reflect that emission factor development testing will not have to be repeated.

The MACT applicability section on page 7 states that the facility is subject to Subpart DDDD, then farther down explains that it is not subject because it is a minor source. PFP requests that the analysis state in the first sentence that the facility is not subject to Subpart DDDD, in case the reader does not read through the whole section.

Pages 10 and 11 explain the transition of the HAPs emission factor development testing to an ongoing compliance testing requirement. PFP requests that this section be reviewed along with Condition 10.

DEQ Response #2: These updates have been made as requested.

APPENDIX B – PROCESSING FEE

PTC Fee Calculation

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: Plummer Forest Products, Inc.
Address: 401 N. Potlatch Road
City: Post Falls
State: Idaho
Zip Code: 83877
Facility Contact: Jeff Carlson
Title: Safety & Environmental Coordinator

AIRS No.: 055-00018

N Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

N Did this permit require engineering analysis? Y/N

N Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	0	0.0
SO ₂	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	0.0	0	0.0
Fee Due	\$ 250.00		

Comments:

This revision did not include any changes other than some updating of language and did not constitute any engineering analysis.

APPENDIX C – PROCESS EQUIPMENT DETERMINATION

RECEIVED

AUG 15 2011

DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A.Q. PROGRAM

PARTICLEBOARD PLANT

August 3, 2011

Eric Clark, EIT
Air Quality Permit Engineer
Department of Environmental Quality
1410 N. Hilton Street
Boise, Idaho 83706

Re: Plummer Forest Products, PTC Modification Application

Dear Eric:

Plummer Forest Products (PFP) owns and operates a particleboard manufacturing plant at Post Falls, Idaho. The Post Falls mill is regulated under PTC P-2010.0042 and Tier I operating permit T1-2010.0040. PFP has filed a Tier I permit renewal application which requested changes to Tier I permit conditions that are based on conditions in the underlying PTC permit.

In response to PFP's requested changes in the Tier I renewal application, DEQ has advised that the PTC permit conditions first need to be revised through the PTC application process. PFP is submitting the attached Form CSPTC and Form GI for the PTC application. A check for the \$1000 PTC application fee is also enclosed.

The Tier I permit application contained information showing that the compliance assurance monitoring (CAM) requirements did not apply to many of the emitting units at the facility because they are process equipment rather than control equipment. This letter provides additional information regarding the function of material handling baghouses in the particleboard manufacturing system, and demonstrates why PFP considers these baghouses to be process equipment. In cases where PFP considers the baghouse to be process equipment, a three-step evaluation is provided based on the EPA guidance letter provided by Idaho DEQ (David Solomon, Letter to Timothy Mohin, November 27, 1995).

Particleboard Manufacturing Background

The particleboard manufacturing process uses very small, dry particles of wood (furnish) to create the product. At the Post Falls mill, sanderdust from the particleboard sander is used as fuel in the boiler. The wood furnish and sanderdust fuel is too fine to be transported by any means other than pneumatic conveying. The particleboard plant uses pneumatic transportation systems to contain and capture the process material and to push or pull it through the manufacturing system.

The particleboard manufacturing process relies on pneumatic transportation of fine wood particles from one part of the process to another. Baghouses are used throughout the pneumatic transport systems to separate fine wood particles from the transporting air streams. The baghouses are generally transfer points that move material from one point in the process to another. When used as part of the transportation system, baghouses are process equipment rather than emissions control equipment.

Process Equipment Determination

In the following sections, the purpose of each baghouse is described. In cases where PFP considers the baghouse to be process equipment, a three-step evaluation is provided based on the EPA guidance letter (David Solomon, Letter to Timothy Mohin, November 27, 1995). According to the EPA guidance letter on process equipment, the following list of questions should be considered in making such case-by-case

judgments as to whether certain devices or practices should be treated as pollution controls or as inherent to the process:

1. Is the primary purpose of the equipment to control air pollution?
2. Where the equipment is recovering product, how do the cost savings from the product recovery compare to the cost of the equipment?
3. Would the equipment be installed if no air quality regulations are in place?

The evaluation of these criteria has been combined with the CAM applicability information submitted with the Tier I renewal application. Emissions calculations for controlled emitting units that use emissions control technology are attached to this letter. The emitting units are discussed in the order they are listed in Table 1.1 of the PTC.

Drag Chain and Drag Chain Baghouse BH-1

The Drag Chain is a material handling system, and the Drag Chain Baghouse BH-1 is a transfer point in that system. Each of the questions related to whether or not BH-1 is process equipment is answered below:

1. The primary purpose of BH-1 is to separate wood particles from the transporting air stream so it can be transferred to another point in the manufacturing process.
2. BH-1 separates process material from the transport stream for use in the process. It does not recover material that would otherwise be lost to the atmosphere.
3. BH-1 would be installed even if no air quality regulations were in place. If it were not installed, wood chips could not be transported to the next processing point.

The answers to the three guideline questions show that BH-1 is process equipment. The emitting unit is the 'Drag Chain and Drag Chain Baghouse BH-1.' The facility does not rely on additional control equipment to meet emissions standards from this source, and the CAM rule does not apply.

Hammermills, Cyclone and Baghouse BH-2

The Hammermill Baghouse BH-2 is part of the material handling and separation process for the screening and grinding process. This baghouse was labeled BH-3A in the PTC, but the preferred label is BH-2. Ground up wood from the hammermill is first blown to a cyclone, where the larger pieces are removed from the air stream for further processing. The air stream then carries the smaller furnish pieces to the baghouse where they are separated from the transport air for use in the manufacturing process.

Each of the questions related to whether or not BH-2 is process equipment is answered below:

1. The primary purpose of BH-2 is to separate finely ground wood from the transporting air stream so it can be used in the manufacturing process.
2. BH-2 separates process material from the transport stream for use in the process. It does not recover material that would otherwise be lost to the atmosphere.
3. BH-2 would be installed even if no air quality regulations were in place. If it were not installed, fine material could not be transported from the hammermill for use in the process and the system would not function.

The answers to the guideline questions show that BH-2 is process equipment. The emitting unit is the 'Rotex Screen #1, #2; Hammermills, Hammermill Cyclone and Baghouse BH-2.' This emitting unit has no emissions control device. Because the facility does not rely on additional control equipment to meet emissions standards from this emitting unit, the CAM rule does not apply to BH-2.

Outside Silo High Pressure Air System Baghouse BH-4

This baghouse should be labeled BH-4, not BH-5A. The Outside Silo High Pressure Air System Baghouse BH-4 is emissions control equipment. This baghouse controls emissions from the outside dry silo vent and removes particulate matter from the silo vent stream before it is exhausted to the atmosphere.

The emissions source is the 'Outside Dry Silo', and BH-4 is the control equipment. If BH-4 were not in place, silo vent emissions would be uncontrolled. Estimated uncontrolled PM emissions from the silo vent are 29 tpy, and estimated uncontrolled PM₁₀ emissions are 16 tpy. Because the uncontrolled PM and PM₁₀ emissions are less than 100 tpy, the Outside silo High Pressure Air System Baghouse BH-4 is not subject to the CAM rule.

Scalper Air System Baghouse BH-5

The Scalper Air System Baghouse BH-5 is part of the forming process. The pneumatic transport system and baghouse recycles excess material scraped off the top of the mat to obtain the required thickness. The scalper air system is designed to collect and reuse furnish material from the forming process.

Each of the questions related to whether or not BH-5 is process equipment is answered below:

1. The primary purpose of BH-5 is to separate particleboard furnish material from the collecting and transporting air stream so it can be used in the manufacturing process.
2. BH-5 separates process material from the transport stream for use in the process. This portion of the manufacturing process is designed with the return pneumatic transport loop. Therefore, the baghouse does not recover material that would otherwise be lost to the atmosphere.
3. The pneumatic transport system that includes BH-5 would be installed even if no air quality regulations were in place. If it were not installed, the forming system would need to be redesigned.

The answers to the guideline questions show that BH-5 is process equipment. The emitting unit is the 'Blender, Former and Scalper Air System Baghouse BH-5.' There is no emissions control device. BH-5 is process equipment and is not subject to the CAM rule.

East and West Sawline Baghouses, BH-9 and BH-10

The East and West Sawline Baghouses are emissions control equipment used to control emissions from the pneumatic dust collection system on the sawline and associated processes. The PTC identifies the East Sawline Baghouse as BH-10A, but it should be BH-9.

If the pneumatic collection system and baghouses were not in use, sawdust would fall to the mill floor and fugitive dust would be emitted to the atmosphere. The emissions unit is the 'Board Cooler, Process Fugitives, Rip and Trim Saws.' Estimated uncontrolled fugitive emissions from the sawline sources would be 24 tpy PM and 14 tpy PM₁₀. Because the uncontrolled emissions would be less than 100 tpy, the East and West Sawline Baghouses are not subject to the CAM rule.

Reclaim Baghouse, BH-3

The Reclaim Baghouse BH-3 recycles furnish material to be returned to the forming process, including trim mats and material that falls to the floor. The furnish material is reclaimed pneumatically through the baghouse and reused in a continuous process.

Each of the questions related to whether or not BH-3 is process equipment is answered below:

1. The primary purpose of BH-3 is to separate particleboard furnish material from the collecting and transporting air stream so it can be used in the manufacturing process.
2. BH-3 separates process material from the transport stream for use in the process. This portion of the manufacturing process is designed with the return pneumatic transport loop. Therefore, the baghouse does not recover material that would otherwise be lost to the atmosphere.
3. BH-3 and the rest of the reclaim pneumatic transport system would be installed even if no air quality regulations were in place. Without this system, the manufacturing process would have to be redesigned.

The answers to the guideline questions show that BH-3 is process equipment. The emitting unit is the 'Board Trim and Baghouse BH-3', and there is no emissions control device. Because BH-3 is process equipment it is not subject to the CAM rule.

Sanderdust Storage Silo Baghouse BH-6

The Sanderdust Storage Silo Baghouse BH-6 is control equipment used to control particulate emissions from the Sanderdust Storage Silo. If BH-6 were not in place, emissions from the silo vent would be uncontrolled. Estimated uncontrolled emissions from the Sanderdust Storage Silo are 6.2 tpy PM and 3.1 tpy PM₁₀. Because the uncontrolled emissions are less than 100 tpy, BH-6 is not subject to the CAM rule.

Sander Air System Baghouse BH-7

The Sander Air System Baghouse BH-7 is process equipment. This baghouse is part of the pneumatic transport system that captures all the sanderdust as it is sanded off the panels. The sanderdust separated in the baghouse is dropped out thru a feeder into a high pressure blower line which sends it to the sanderdust silo. The Sander Air System Baghouse BH-7 is process equipment because it is required to operate the sanderdust handling system.

Each of the questions related to whether or not BH-7 is process equipment is answered below:

1. The primary purpose of BH-7 is to transport sanderdust for use as fuel in the boiler. It is not air pollution equipment because it is used as part of the pneumatic sanderdust transport system.
2. BH-7 allows the recovery of sanderdust for boiler fuel. Even if the sanderdust were not used as fuel, it would have to be transported using a pneumatic system and a baghouse would be needed to separate the sanderdust from the air stream. The EPA guideline asks for an evaluation of the cost of the recovering the material compared to the cost of the equipment. In this case, baghouse is required even if sanderdust is not used as fuel, so there is no additional cost for recovery.
3. BH-7 and the rest of the sanderdust pneumatic transport system would be installed even if no air quality regulations were in place. Without this system, the sanderdust could not be used as fuel in the boiler which would create a waste stream and increase energy costs.

The answers to the guideline questions show that BH-7 is process equipment. The emitting unit is the 'Sander Air System Baghouse BH-7' and there is no emissions control device. Because BH-7 is process equipment it is not subject to the CAM rule.

Sanderdust Overs Baghouse BH-8

The Sanderdust Overs Baghouse BH-8 is a transfer point in the transport and separation of oversized pieces collected in the sifter screen. This baghouse is part of the material handling system and is process equipment.

Each of the questions related to whether or not BH-8 is process equipment is answered below:

1. The primary purpose of BH-8 is to separate oversized sanderdust pieces from the collecting and transporting air stream.
2. BH-8 separates material from the transport stream for processing and use as fuel. The mill relies on the pneumatic transport system for sanderdust handling, and BH-8 does not recover material that would otherwise be lost to the atmosphere.
3. BH-8 and the rest of the sanderdust fuel system and would be installed even if no air quality regulations were in place.

The answers to the guideline questions show that BH-8 is process equipment. The emitting unit is the 'Sanderdust Overs Baghouse BH-8', and there is no emissions control device. Because BH-8 is process equipment it is not subject to the CAM rule.

Boiler Multiclone and ESP

The Boiler is an emitting unit that is subject to particulate matter emission limits, and uses a multiclone and electrostatic precipitator (ESP) to meet that limit. The boiler likely has pre-control potential emissions of more than 100 tpy of particulate matter. Therefore, the CAM regulations apply to the boiler. A Form CAM for the multiclone and ESP was provided in the Tier I application.

Particle Dryer and Multiclone

The Particle Dryer is the emitting unit and the multiclone is emissions control equipment. If the multiclone were not in place, uncontrolled PM emissions from the particle dryer would be 36 tpy and uncontrolled PM₁₀ emissions and would be 18 tpy. Because the uncontrolled emissions would be less than 100 tpy, the Particle Dryer Multiclone is not subject to the CAM rule.