



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

January 17, 2011

Frank R. Bennett
President
Bennett Lumber Products, Inc. - Princeton
PO Box 130
Princeton, Idaho 83857

RE: Facility ID No. 057-00008, Bennett Lumber Products, Inc., Princeton
Tier I Operating Permit Administrative Amendment

Dear Mr. Bennett:

The Department of Environmental Quality (DEQ) is issuing amended Tier I Operating Permit No. TI-050201 project 60630 for Bennett Lumber Products, Inc. at Princeton in accordance with IDAPA 58.01.01.381, Rules for the Control of Air Pollution in Idaho. This permit has been administratively amended by DEQ by updating much of the language throughout the permit. Reference to a venturi scrubber was replaced with verbiage more representative of the operations at the facility. Also, the CAM plan was incorporated in the permit. Due to that change several O&M Manual permit conditions became obsolete and were removed accordingly. Finally, the MACT standard, Subpart ZZZZ, requirements were incorporated for the emergency John Deere fire pump onsite. This updated T1 Operating Permit is effective immediately.

Please be aware this permit replaces Tier I Operating Permit No. TI-050201, dated August 2, 2010, the terms and conditions of which shall no longer apply.

If you have questions regarding the amendment procedure or this notification, please contact Eric Clark at 208-373-0502 or Eric.Clark@deq.idaho.gov.

Sincerely,

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

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/EC

Permit No. TI-050201 Proj 60630



**Air Quality
TIER I OPERATING PERMIT**
State of Idaho
Department of Environmental Quality

PERMIT No.: T1-050201
FACILITY ID No.: 057-00008
AQCR: 62 **CLASS:** A **ZONE:** 11
SIC: 2421 **NAICS:** 321999
UTM COORDINATE (km): 517.4, 5195.7

1. PERMITTEE

Bennett Lumber Products, Inc.

2. PROJECT # 60528

Tier I Operating Permit Administrative Amendment

3. MAILING ADDRESS

P.O. Box 130

CITY

Princeton

STATE

Idaho

ZIP

83857

4. FACILITY CONTACT

Jeff Abbot

TITLE

Plant Engineer

TELEPHONE

(208) 875-1121

5. RESPONSIBLE OFFICIAL

Frank R. Bennett

TITLE

President

TELEPHONE

(208) 875-1121

6. EXACT PLANT LOCATION

3759 Highway 6, Princeton (Three miles east of Princeton)

COUNTY

Latah

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Sawmill producing dimensional lumber, woodchips, hog-fuel, and wood shavings

8. PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300 through 386. The permittee shall comply with the terms and conditions of this permit.

This permit 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 effective date of this permit is the date of signature by DEQ on the cover page.

ERIC CLARK, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:	February 11, 2010
DATE MODIFIED/AMENDED	January 17, 2011
DATE EXPIRES:	February 11, 2015

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Acronyms, Units, and Chemical Nomenclature

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
bhp	brake horsepower
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per year
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
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
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
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
RICE	Reciprocating internal combustion engine
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide

SO _x	sulfur oxides
T/yr	tons per year
TAP	toxic air pollutants
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compounds
µg/m ³	micrograms per cubic meter

1. TIER I OPERATING PERMIT SCOPE

Purpose

- 1.1 The scope of the permit revision is to correct some typographical errors and incorporate approved CAM plan requirements. The permittee has requested some verbiage throughout the permit be consistent with language used in the associated Tier I CAM plan. Rather than referring to monitoring pressure drop across the scrubber, it has been replaced with monitoring ID Fan (scrubber inlet) duct pressure. The scrubber is no longer identified as a “venturi” scrubber. This is more consistent with the actual process and terminology used at the plant. Also, the emergency fire pump requirements as defined in NESHAP, Subpart ZZZZ were included. No other changes were requested.

This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the *Rules*.

- 1.2 This Tier I operating permit incorporates the requirements of the following permits:

- Permit to Construct No. P-2007.0107 Project 60629, issued January 17, 2011

- 1.3 This administrative amendment supersedes Tier I Operating Permit No. T1-050201 Project 60527, issued August 2, 2010.

Regulated Sources

- 1.4 Table 1.1 lists all sources of emissions regulated in this Tier I operating permit.

Table 1.1 REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Truck bark bin	None
2	Truck sawdust bin	None
2	Truck chip bin	None
2	Boiler fuel storage	None
2	Auxiliary fuel bin	None
2	Shavings truck bin	None
2	Log yard waste No.1	None
2	Rock storage	None
2	Log yard waste No. 2	None
2	Ash storage	None
2	Hog in-feed conveyor	None
2	Bark conveyor system	None
2	Hog out-feed conveyor	None
2	Bark screen oversize	None
2	Deck trash conveyor	None
2	Truck bark bin conveyor	None
2	Boiler bark conveyor	None
2	Sawdust conveyor - vibrator	None
2	Chip oversize conveyor	None
2	Main fuel conveyor	None
2	Auxiliary fuel-bin conveyor	None
2	Flyash transport	None
2	Sawmill	None
2	Small log debarker	None
2	Large log debarker	None
2	Bark hog	None
2	Bark screen	None
2	Baghouse cyclone	None
2	Chip screen	None
2	Planing mill – new	None

Permit Section	Source Description	Emissions Control(s)
2	Planing mill – old	None
2	20,000-gallon diesel fuel tank	None
2	20,000-gallon diesel fuel tank	None
2	20,000-gallon gasoline tank	None
2	2,500-gallon diesel fuel tank	None
2	1,000-gallon stove oil tank	None
2	30-gallon parts washer	None
2	30-gallon parts washer	None
2	30-gallon parts washer	None
2	2,000-gallon aviation gas storage	None
2	1,000-gallon used oil tank	None
2	2,000-cubic yard rock storage	None
2	Bark bin to truck	None
2	Sawdust bin to truck	None
2	Chip bin to truck	None
2	Shavings bin to truck	None
3	Zurn Industries hog-fuel boiler: Type C, rated at 60,000 pound per hour saturated steam; installed 1978	Zurn Industries multiclone followed by Zurn wet scrubber, 11,400 actual cubic feet per minute (acfm).
4	Dry kilns No. 1 and No. 2: Manufacturer: Moore Length: 73 feet Design: Double track Installed June 1972 and June 1964 Dry Kiln No. 3: Manufacturer: Lumber systems Inc Length: 73 feet Design: Single track Installed: March 1984 Dry Kilns No. 4, No. 5, and No. 6: Manufacturer: Lumber systems Inc. Length: 73 feet Design: Double track Installed: June 1977, June 1977, and January 1989, respectively Dry Kiln No. 7 Manufacturer: Wellons Length: 73 feet Design: Double-track Permitted for installation: October 6, 2005	None
5	Woodworking Equipment	Sawdust Cyclone P7: 2,000 ft per acfm, Shavings Cyclone P11: 34,600 acfm Shavings Cyclone P12: 43,000 acfm Shavings Cyclone P13: 43,000 acfm Shavings Cyclone P14: 43,000 acfm Sawdust Cyclone P21: 2000 acfm
6	Emergency compression ignition engine Manufacturer: John Deere Model: 6081AF001 Rated Capacity: 270 hp	None

2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 2.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Condition	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference	Monitoring and Recordkeeping Requirements
2.1	Fugitive dust	Reasonable control	IDAPA 58.01.01.651	2.2, 2.3, 2.4, 2.11, 2.12
2.5	Odors	Reasonable control	IDAPA 58.01.01.776.01	2.6, 2.11, 2.12
2.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	2.8, 2.11, 2.12
2.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	2.9.1-2.9.5, 2.11, 2.12
2.10	Criteria air pollutants, opacity	Performance testing	IDAPA 58.01.01.157	2.10, 2.11
2.13	Fuel burning	Compliance with IDAPA 58.01.01.676-677	IDAPA 58.01.01.676-677	2.11, 2.12
2.14	Sulfur Content	0.3% for ASTM Grade 1; 0.5% for ASTM Grade 2	IDAPA 58.01.01.728	2.12, 2.14.1
2.15	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	2.11, 2.12
2.16	Risk management	Compliance with IDAPA 58.01.01.322 and 40 CFR 68	IDAPA 58.01.01.322, 40 CFR 68	2.11, 2.12
2.17	Recycling and Emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	2.11, 2.12

Fugitive Dust

- 2.1** All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. **[IDAPA 58.01.01.650-651, 3/30/07]**
- 2.2** 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 dust emissions. **[IDAPA 58.01.01.322.06, 07, 5/1/94]**
- 2.3** The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken. **[IDAPA 58.01.01.322.06, 07, 5/1/94]**
- 2.4** The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust 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 quarterly fugitive dust 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 dust emissions, and the date the corrective action was taken.

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

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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

- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date 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

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, 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]

- 2.8 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 action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

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 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Excess Emissions

Excess Emissions - General

- 2.9 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 Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.
- 2.9.1 The person responsible for or in charge of a facility during an excess emissions event 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, Scheduled Maintenance

- 2.9.2 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 owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

[IDAPA 58.01.01.133, 4/5/00]

- A prohibition of any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.
- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the owner or operator demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
- The owner or operator of a source of excess emissions shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.a, 3/20/97]

[IDAPA 58.01.01.133.01.b, 4/5/00]

[IDAPA 58.01.01.133.01.c, 3/20/97]

Excess Emissions – Upset, Breakdown, or Safety Measures

- 2.9.3 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 owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/11/06]

- 2.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures which cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

- The owner or operator shall 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.
[IDAPA 58.01.01.134.02.a, 4/5/00]
- The owner or operator shall 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 owner or operator demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
[IDAPA 58.01.01.134.02.b, 4/5/00]
- The owner or operator shall report and record the information required pursuant to Permit Conditions 2.9.4 and 2.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
[IDAPA 58.01.01.134.02.c, 3/20/97]

2.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the owner or operator 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 facility owner or operator.
[IDAPA 58.01.01.134.03 4/5/00]

Excess Emissions – Reporting and Recordkeeping

2.9.4 A written report for each excess emissions event shall be submitted to DEQ by the owner or operator 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 58.01.01.135.01 and 02, 4/11/06]

2.9.5 The owner or operator 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:
[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

- 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
[IDAPA 58.01.01.136.03.a, 4/5/00]
- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.
[IDAPA 58.01.01.136.03.b, 3/20/97]

Performance Testing

2.10 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.

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

Unless a longer time is approved by DEQ, the permittee shall submit a compliance test report for the respective test to DEQ within 30 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.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Lewiston Regional Office
1118 "F" St.
Lewiston, ID 83501
(208) 799-4370

Fax: (208) 779-3451

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

Monitoring and Recordkeeping

- 2.11 The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, 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 58.01.01.322.07, 5/1/94]

Reports and Certifications

- 2.12 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" St.
Lewiston, ID 83501
(208) 799-4370 Fax: (208) 779-3451

The periodic compliance certification required by General Provision 21 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, 5/1/94]

Fuel-Burning Equipment

- 2.13 The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

Sulfur Content

- 2.14 The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
- ASTM Grade 1 fuel oil - 0.3% by weight.
 - ASTM Grade 2 fuel oil - 0.5% by weight.

[IDAPA 58.01.01.728, 5/1/94]

- 2.14.1 The permittee shall not sell, distribute, use, or make available for use, any coal containing greater than 1.0% sulfur by weight.

[IDAPA 58.01.01.729, 5/1/94]

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

[IDAPA 58.01.01.322.06, 5/1/94]

Open Burning

- 2.15 The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 04/02/08T]

Regulated Substances for Accidental Release Prevention

- 2.16 An owner or operator 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

- 2.17 The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.
[40 CFR 82, Subpart F]

NSPS/NESHAP General Provisions

2.18 ***NSPS 40 CFR 60, Subpart A – General Provisions***

The boiler at the facility is a category source of 40 CFR 60, the date of manufacture of the boiler is prior to applicability date to the requirements of 40 CFR 60.

[40 CFR 60, Subpart A]

2.19 ***NESHAP 40 CFR 61, Subpart A – General Provisions***

The facility does emit HAPs. The HAPs emitted are not subject to a standard applicable to 40 CFR 61.

[40 CFR 61, Subpart A]

2.20 ***NESHAP 40 CFR 63, Subpart A – General Provisions***

While the facility does emit HAPs, the HAPs emitted are not from a source category applicable to 40 CFR 63.

[40 CFR 63, Subpart A]

Incorporation of Federal Requirements by Reference

- 2.21 Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60
- National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61
- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

Facility-Wide Limits on Hazardous Air Pollutant Emissions

- 2.22 Facility-wide emission in any consecutive 12-calendar months shall not exceed 9.49 tons of any one hazardous air pollutant (HAP), and 24.49 tons for all HAPs combined.

[PTC No. P-2007.0107, 01/17/2011]

3. HOG-FUEL BOILER

Summary Description

Bark from the log debarking process is sent to a bark hog where it is reduced to a size appropriate for use as boiler fuel and conveyed to the main fuel conveyor (TR10). Sawdust from the sawmill and shavings from the planing mills are also conveyed to the main fuel conveyor to be used as boiler fuel. The Zurn Industries hog-fuel boiler is an Erie City Type C, three-drum water tube boiler using a spreader-stoker firing method, with ash reinjection and four (4) manually-operated soot blowers. The boiler is designed to continuously provide 60,000 pounds per hour of saturated steam at 250°F to the lumber drying kilns.

Table 3.1 describes the devices used to control emissions from the Zurn Hog-Fuel Boiler.

Table 3.1 ZURN HOG-FUEL BOILER DESCRIPTION

Emissions Unit / Process	Emissions Control Device
Hog-Fuel Boiler	Multiclone in series with a wet scrubber and cyclone separator

Table 3.2 contains only a summary of the requirements that apply to the hog-fuel boiler. Specific permit requirements are listed below Table 3.2.

Table 3.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
3.1	PM grain loading	PM emissions shall not exceed 0.200 gr/dscf at 8% oxygen	IDAPA 58.01.01.677	3.7, 3.8, 3.13, 3.14, 3.15
3.2	PM ₁₀ , NO _x , and CO limits	Hourly and annual emissions limits	PTC P-2007.0107 (10/7/09)	3.7, 3.8, 3.13
3.3	Fuel Type	Exclusively wood products	PTC P-2007.0107 (10/7/09)	3.7, 3.8
3.4	Steaming rate	Determine by equation (not to exceed 60, 000 lb/hr)	PTC P-2007.0107 (10/7/09)	3.7, 3.8, 3.10
3.5	Multiclone and scrubber	Maintain pressure drop, conduct routine maintenance	PTC P-2007.0107 (10/7/09) 40 CFR 64.3	3.5, 3.7, 3.8, 3.10, 3.11,
3.7	Performance test	Determine PM ₁₀ , PM and CO emission rates	IDAPA 58.01.01.157, IDAPA 58.01.01.322.09, 40 CFR 64.3	3.8, 3.10, 3.11

Permit Limits / Standard Summary

- 3.1** A person shall not discharge into the atmosphere from any fuel burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than ten (10) million BTUs per hour, particulate matter in excess of .200 gr/dscf corrected to 8% oxygen while combusting wood fuel.

[PTC No. P-2007.0107, 01/17/2011]

3.2 Emissions of PM₁₀ and CO shall not exceed the corresponding limits below in Table 3.3.

Table 3.3 HOG-FUEL BOILER HOURLY AND ANNUAL EMISSIONS LIMITS

Source Description	PM ₁₀ ^c		CO
	lb/hr	T/yr	T/yr
Zurn hog-fuel boiler	27	99.48	249

^aAs determined by a pollutant-specific U.S. EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

^bAs determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^cIncludes condensables.

[PTC No. P-2007.0107, 01/17/2011]

Operating Requirements

3.3 Fuel Type

The hog-fuel boiler shall be fueled exclusively by wood products.

[PTC No. P-2007.0107, 01/17/2011]

3.4 Steam Production and Steaming Rate Limits

3.4.1 The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the steam production rate of the Zurn Industries hog fuel boiler. If the continuous steaming rate measurement system becomes inoperable, a backup monitoring method consisting of manual hourly readings or calculations shall be implemented within 96 hours of the continuous steaming rate measurement system becoming inoperable, and shall be used until the original system is operational.

[PTC No. P-2007.0107, 01/17/2011]

3.4.2 On a 24-hour average, the operational steaming rate shall be maintained at or below the lesser of:

- 60,000 pounds of steam per hour,
- A maximum steaming rate in pounds per hour based on the average one-hour steaming rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with the PM₁₀ lb/hr emissions limit in Permit Condition 3.3.1, calculated as follows:

$$\text{Max. steaming rate} = \text{Avg. steaming rate during test} \times \frac{27 \text{ lb/hr PM}_{10}}{\text{Tested lb/hr PM}_{10}}$$

- A maximum rate in pounds per hour based on the average one-hour steaming rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with the grain loading emissions limit in Permit Condition 3.3.2, calculated as follows:

$$\text{Max. steaming rate} = \text{Avg. steaming rate during test} \times \frac{0.20 \text{ gr/dscf @ 8\% Oxygen}}{\text{Tested grain loading @ 8\% Oxygen}}$$

The permittee may conduct additional performance tests during the permit term to revise the allowable steaming rate so long as the performance tests conform to all requirements of this permit. Whenever the steaming rate exceeds the allowable steaming rate, the permittee shall take corrective action within a reasonable time, but no longer than 24 hours from the discovery of the exceedance, to bring the steaming

rate to the allowable rate or below. Deviations from this allowable operating rate shall not constitute a violation of this permit, unless the permittee fails to take corrective action or an emission standard prescribed in this permit is exceeded. DEQ may consider the frequency, duration, or magnitude of the deviations to determine if additional action is required.

[PTC No. P-2007.0107, 01/17/2011]

3.5 Multiclone and Wet Scrubber Operations

3.5.1 The permittee shall install and operate a multiclone in series with a wet scrubber and cyclone separator to control the emissions from the hog fuel boiler.

[PTC No. P-2007.0107, 01/17/2011]

3.5.2 The multiclone and wet scrubber shall be in operation at all times during operation of the hog fuel boiler.

[PTC No. P-2007.0107, 01/17/2011]

3.5.3 The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the ID fan outlet (scrubber inlet) pressure and the pressure drop across the multiclone during operation of the hog fuel boiler.

[PTC No. P-2007.0107, 01/17/2011]

3.5.4 The permittee shall install, operate, calibrate, and maintain a device to continuously measure the scrubbing media flow rate in gallons per minute.

[PTC No. P-2007.0107, 01/17/2011]

3.6 Performance Testing Operations

The permittee may conduct additional performance tests during the permit term to revise the allowable ID fan outlet (scrubber inlet) pressure or the minimum scrubbing media flow rate so long as the performance tests conform to all the requirements of this permit and the performance tests demonstrate compliance with the PM₁₀ pound per hour limit and the grain loading standard for the Zurn hog-fuel boiler while operating at the alternative operating parameters.

- The performance test shall be conducted in accordance with the Test Methods and Procedures specified in the Rules (IDAPA 58.01.01.157) and in accordance with a DEQ-approved source test protocol.
- The permittee may request to operate outside of the operating parameters specified by the manufacturer during the performance test by submitting a written source test protocol to DEQ for approval and requesting to operate under alternative operating parameters for the duration of the test.
- The protocol shall describe how the operating parameters will be monitored during the performance test.
- Once the source test is completed the permittee may request in writing to operate in accordance with alternative CAM operating parameters. The request shall include a source test report and justification for the alternative CAM operating parameters.

Monitoring and Recordkeeping Requirements (CAM Plan: See Section 7)

3.7 Performance Testing

3.7.1 The permittee shall conduct a performance test on the Zurn hog-fuel boiler to demonstrate compliance with the opacity limit, the PM₁₀ lb/hr emissions limit, and the grain loading standard, and to determine the CO one-hour average emission rate.

The permittee shall test in accordance with IDAPA 58.01.01.157 and the conditions of this permit including the operating requirements for the Zurn hog-fuel boiler and the Performance Testing Condition

General Provision. The Performance Testing Condition General Provision includes notification requirements, testing procedures, and reporting requirements.

The source test shall be conducted under “worst case normal” conditions as required by IDAPA 58.01.01.157 and Performance Testing Condition General Provision and the source test report shall contain documentation that the test was conducted under these conditions.

The following information, at a minimum, shall be recorded during each performance test run and included in the performance test report:

- The steam production rate of the boiler shall be recorded in pounds per hour;
- The ID fan outlet (scrubber inlet) pressure and pressure drop across the multiclone shall be recorded in inches of water at least once each 15 minutes during each test run;
- The scrubbing media flow rate shall be recorded in gallons per minute once each 15 minutes during each test run; and
- Visible emissions from the boiler stack shall be observed and recorded during each test run, using the methods specified in IDAPA 58.01.01.625.

[PTC No. P-2007.0107, 01/17/2011]

- 3.7.2 After the initial performance test, future testing shall be performed according to the following schedule. If the PM or PM₁₀ emission rate measured in the most recent test is less than or equal to 75% of the applicable emission limit, the next test shall be conducted within five years of the test date. If the PM or PM₁₀ emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the applicable emission limit, the next test shall be conducted within two years of the test date. If the PM or PM₁₀ emission rate measured during the most recent performance test is greater than 90% of the applicable emission limit, the next test shall be conducted within one year of the test date.

[PTC No. P-2007.0107, 01/17/2011]

- 3.7.3 After the initial performance test, future testing shall be performed according to the following schedule. If the CO emission rate measured in the most recent test is less than 43 lb/hr, no further testing shall be required. If the CO emission rate measured during the most recent performance test is equal to or greater than 43 lb/hr, the next test shall be conducted within five years of the test date.

[PTC No. P-2007.0107, 01/17/2011]

3.8 Maintain Copy of Source Tests

A copy of the most recent DEQ-approved source test for each pollutant tested and a copy of the corresponding DEQ review/approval letter which contains the permit number shall remain onsite at all times and shall be made available to Department representatives upon request.

[PTC No. P-2007.0107, 01/17/2011]

3.9 HAPs Monitoring

The permittee shall calculate and record the emissions of methanol and total HAPs from the hog-fuel boiler on a monthly basis, in units of tons per month and tons for the most recent consecutive 12-calendar month period.^a These totals shall be combined with the methanol and total HAPs emissions from the kilns for the same period to demonstrate compliance with the facility-wide HAPs limits.

[PTC No. P-2007.0107, 01/17/2011]

3.10 Steam Production Monitoring for Boiler

3.10.1 The permittee shall monitor and record the daily steam production of the boiler to demonstrate compliance with steam production limit. Each month, the permittee shall sum the daily steam production for that month and for the previous 12 consecutive calendar-month period. Records shall be maintained on site and shall be made available to DEQ representatives upon request.

[PTC No. P-2007.0107, 01/17/2011]

3.10.2 The permittee shall calculate the annual PM₁₀ emissions as follows:

- Multiply the total monthly steam produced by the emission factor derived from the most recent Department-approved source test. The emission factor shall be in pounds of PM₁₀ per pound of steam produced during the test.
- Sum the monthly PM₁₀ emissions derived above for each 12-consecutive calendar month period.

[PTC No. P-2007.0107, 01/17/2011]

3.10.3 The permittee shall calculate the annual CO emissions as follows:

- Multiply the total monthly steam produced by the emission factor derived from the most recent Department-approved source test. The emission factor shall be the pounds of CO per pound of steam produced during the test.
- Sum the monthly CO emissions derived above for each 12-consecutive calendar month period.

[PTC No. P-2007.0107, 01/17/2011]

3.11

^a Recommended HAP emissions calculations are described in the Statement of Basis for PTC P-2007.0107, Project No. 60629.

4. DRYING KILNS

Summary Description

Green lumber of various wood species processed that has been sorted and debarked, then squared in the sawmill, is stacked in the drying kilns. Indirect heat (i.e., steam from the Zurn hog-fuel boiler) is supplied to these single- and double-track drying kilns to reduce the moisture content in the green lumber from approximately 43% to 47% to a pre-determined moisture level, usually about 19%.

Table 4.1 describes the devices used to control emissions from drying kilns.

Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Lumber Drying Kilns No. 1 through No. 7	None

Table 4.2 contains only a summary of the requirements that apply to the drying kilns. Specific permit requirements are listed below Table 4.2.

Table 4.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
4.1.1	Emission Limits	PM ₁₀ 3.94 T/yr, VOC 110.3 T/yr	PTC No. P-2007.0107 (10/7/09)	4.1.2, 4.1.3, 4.2
4.1.2	Particulate matter	Equation	IDAPA 58.01.01.702	4.2, 4.4
4.1.3	Particulate matter	Equation	IDAPA 58.01.01.701	4.2,4.4
4.2	Throughput	157,585 thousand board feet (lumber scale)	PTC No. P-2007.0107 (10/7/09)	4.7
4.5	HAPs Monitoring	Equation	PTC No. P-2007.0107 (10/7/09)	4.3, 4.4, 4.6

Permit Limits / Standard Summary

4.1 Emission Limits

- 4.1.1 The PM₁₀ and VOC emissions from the Kilns 1 through 7 vents (combined) shall not exceed any corresponding emissions rate limits listed in Table 4.3.

Table 4.3 DRYING KILN EMISSIONS LIMITS

Source Description	PM ₁₀	VOC
	T/yr	T/yr
Lumber Drying Kilns 1 through 7 combined emissions	3.94	110.3

[PTC No. P-2007.0107, 01/17/2011]

- 4.1.2 In accordance with IDAPA 58.01.01.702, the permittee shall not discharge into the atmosphere from any source operating prior to October 1, 1979, particulate matter in excess of the amount shown by the

following equations, where E is the allowable emission 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 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 17,000 pounds per hour,

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

[PTC No. P-2007.0107, 01/17/2011]

- 4.1.3 In accordance with IDAPA 58.01.01.701, the permittee shall not discharge to the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission 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 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 9,250 pounds per hour,

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

[PTC No. P-2007.0107, 01/17/2011]

Operating Requirements

4.2 Throughput Limits – Kilns 1 through 7, Combined

The throughput through Kilns 1 through 7 combined shall not exceed 157,585 thousand board feet (lumber scale) in any consecutive 12-calendar months.

[PTC No. P-2007.0107, 01/17/2011]

4.3 Temperature Monitoring – Kilns 1 through 7

The permittee shall install, calibrate, maintain, and operate a device on each kiln to measure and record the kiln temperature.

[PTC No. P-2007.0107, 01/17/2011]

Monitoring and Recordkeeping Requirements

4.4 Throughput Monitoring by Wood Species

Each month, the permittee shall monitor and record the combined throughput of Kilns 1 through 7 in board feet (lumber scale) for each species of wood processed and the total of all wood species processed for that month and for the most recent consecutive 12-calendar month period.

[PTC No. P-2007.0107, 01/17/2011]

4.5 HAPs Monitoring

The permittee shall calculate and record the emissions of methanol and total HAPs from all of the lumber drying kilns on a monthly basis, in units of tons per month and tons for the most recent consecutive 12-calendar month period. These totals shall be combined with the methanol and total HAPs emissions from the hog-fuel boiler for the same period to demonstrate compliance with the facility-wide HAPs limits. HAPs emissions from the kilns shall be calculated using the equation given below and the emission factors listed in Table 4.1. If at any time during the drying time for each load, the temperature is equal to or greater than 200°F, the factor for > 200°F shall be used to calculate emissions for that load. Use of alternate emission factors requires prior DEQ approval.

$$HAP = \sum_{i=1}^n (X_i \times Y_i) \times (ton/2000 lbs)$$

Where:

- HAP = Kiln Emissions of a specific HAP or total HAP in tons per month
N = Number of types of wood dried
X_i = Throughput of lumber of type i dried in all kilns in thousand board feet (MBF) per month
Y_i = HAP emission factor for lumber of type i

Table 4.1 KILN HAP EMISSION FACTORS

Wood Species	Max. KilnTemp	Methanol (lb/MBF)	Total HAP (lb/Mbf)
Douglas Fir	< 200 °F	0.038	0.097
Douglas Fir	> 200 °F	0.057	0.116
White Fir	< 200 °F	0.122	0.1824
White Fir	> 200 °F	0.183	0.2434
Ponderosa Pine	< 200 °F	0.065	0.1135
Ponderosa Pine	> 200 °F	0.144	0.1889
Lodgepole Pine	< 200 °F	0.055	0.0736
Lodgepole Pine	> 200 °F	0.060	0.0786

[PTC No. P-2007.0107, 01/17/2011]

4.6 Temperature Monitoring

Once each hour, the permittee shall monitor and record the temperature of each kiln during normal drying operations (for any day that that kiln is in use) to determine the correct HAP emission factor to use for calculating emissions. Alternatively, in lieu of tracking temperature, the higher emission factor shall be used to calculate emissions.

[PTC No. P-2007.0107, 01/17/2011]

5. WOODWORKING EQUIPMENT

Summary Description

Woodworking equipment includes the sawmill and the two planing mills.

Heavy sawdust from the sawmill is transferred by conveyor (TR8) to a sawdust cyclone (P7) or sawdust cyclone target box (P21). Material collected from the P7 sawdust cyclone is conveyed to the hog-fuel boiler. Material collected from the P21 target box is loaded into the sawdust truck bin (ST2) with a bottom drop to trucks (TR14).

Light sawdust from the sawmill is routed first through a baghouse (P24) and then to a baghouse cyclone (P6). Material collected in the baghouse cyclone is conveyed to the hog-fuel boiler.

Shavings from the old and new planing mills are collected in shavings cyclones (P11) and (P12), respectively. The collected material from these two cyclones is conveyed to shavings cyclone (P14) or to shavings cyclone (P13). Material collected from P14 is conveyed to the hog-fuel boiler. Material collected from P13 is loaded into the truck shavings bin (ST6) with a bottom drop to trucks (TR16).

Table 5.1 describes the devices used to control emissions from the sawmill.

Table 5.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Sawmill	Cyclones, baghouses, target box

Table 5.2 contains only a summary of the requirements that apply to the woodworking equipment. Specific permit requirements are listed below Table 5.2.

Table 5.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit / Standard Summary	Applicable Requirements Reference	Operating and Monitoring and Recordkeeping Requirements
5.1	Particulate matter	Equation	IDAPA 58.01.01.702	5.3, 5.4 and 5.5
5.2	Particulate matter	Equation	IDAPA 58.01.01.701	5.3, 5.4 and 5.5

Permit Limits / Standard Summary

- 5.1 In accordance with IDAPA 58.01.01.702, the permittee shall not discharge into the atmosphere from any source operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission 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 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 17,000 pounds per hour,

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

[PTC No. P-2007.0107, 01/17/2011]

5.2 In accordance with IDAPA 58.01.01.701, the permittee shall not discharge into the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission 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 pounds per hour,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 9,250 pounds per hour,

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

[PTC No. P-2007.0107, 01/17/2011]

Operating Requirements

5.3 Operation of cyclones and baghouse/filter systems

The permittee shall install and operate cyclones and baghouse/filter system(s) to control emissions from woodworking equipment at this facility.

[PTC No. P-2007.0107, 01/17/2011]

5.4 Cyclone and Baghouse/Filter System Procedures

Within 60 days of permit issuance, the permittee shall have developed a Cyclone and Baghouse/Filter System Procedures document for the inspection and operation of the cyclones and baghouses/filter system(s) which controls the PM and PM₁₀ emissions from woodworking equipment at this facility. The document shall describe the procedures that will be followed to comply with good working order and efficient operating practices, and shall contain, at a minimum, requirements for monthly inspections of the cyclones and baghouse(s). The inspection procedures shall include, but not be limited to:

- A visible emissions observation while operating;
- If visible emissions are present the opacity of the visible emissions shall be determined in accordance with procedures contained in IDAPA 58.01.01.625;
- Checking the bags or cartridges for structural integrity; and
- Checking to assure that bags or cartridges are appropriately secured in place.

The Baghouse/Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if:

- Visible emissions are determined to be 10% opacity or greater;
- Bags or cartridges are ruptured; or
- Bags or cartridges are not appropriately secured in place.

The Permittee shall maintain records of the results of the baghouse/filter system inspection in accordance with monitoring and recordkeeping permit condition. The records shall include a description of any corrective action that was taken, whether visible emissions were present, and if visible emissions were present the results of visible emission observation as determined by procedures contained in IDAPA 58.01.01.625.

The Cyclone and Baghouse/Filter System Procedures document shall be submitted to DEQ within 60 days of permit issuance for review and comment and shall contain a certification by a responsible official. Any changes to the Cyclone and Baghouse/Filter System Procedures document shall be submitted within 15 days of the change. The Cyclone and Baghouse/Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-2007.0107, 01/17/2011]

Monitoring and Recordkeeping Requirements

- 5.5 The operating and monitoring requirements specified in the Cyclone and Baghouse/Filter System Document are incorporated by reference to this permit and are enforceable permit conditions.

[PTC No. P-2007.0107, 01/17/2011]

6. COMPRESSION IGNITION EMERGENCY INTERNAL COMBUSTION ENGINE

6.1 Process Description

The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart ZZZZ and all applicable general provisions of 40 CFR 63 Subpart A.

Subpart ZZZZ applies to the existing stationary Reciprocating Internal Combustion Engine (RICE) located at area source of HAP emissions. Subpart ZZZZ applies to the existing emergency compression ignition with a rated capacity of 270 bhp. Bennett Lumber Products maintains a John Deere, 6081AF001, 270 bhp compression ignition engine onsite for emergency purposes.

6.2 Compliance Date

In accordance with 40 CFR 63.6595(a)(1), the affected source must comply with the applicable emission and operating limitations of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ by May 3, 2013.

[40 CFR 63.6595(a)(1)]

Operating Requirements

6.3 Emissions and Operating Limitations

In accordance with 40 CFR 63.6603(a), on and after May 3, 2013, the following emission limits or operating restrictions are required for the engine. The permittee must meet the following requirements, except during periods of startup.

- Change oil and filter every 500 hours of operation or annually, whichever comes first.
- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6603(a)]

6.4 On and after May 3, 2013, the permittee shall operate and maintain the diesel engine(s) and associated pollution control equipment (where applicable) in a manner that minimizes emissions. Nothing further is required to reduce emissions other than what is necessary to meet the appropriate limitation in the Emissions Limitations permit condition in accordance with 40 CFR 63.6605.

[40 CFR 63.6605]

Monitoring and Maintenance Requirements

6.5 In accordance with 63.6625(e)(3) and Table 6 of the subpart, on and after May 3, 2013, the permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e)(3)]

6.6 In accordance with 63.6625(f), on and after May 3, 2013, an existing emergency stationary RICE located at an area source of HAP emissions must install a non-resettable hour meter if one is not already installed.

[40 CFR 63.6625(f)]

6.7 On and after May 3, 2013, the engine's time spent at idle during startup shall be minimized to a period needed for appropriate and safe loading of the engine, but not to exceed 30 minutes, after which time the emission standards associated with this permit apply in accordance with 40 CFR 63.6625(h).

[40 CFR 63.6625(h)]

6.8 In accordance with 40 CFR 63.6625(i), on and after May 3, 2013, the permittee has the option of implementing an oil analysis program to extend the specified oil change frequency in the Emissions and Operating Limitations permit condition. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil before continuing to use the engine. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

[40 CFR 63.6625(i)]

6.9 In accordance with 40 CFR 63.6640(f), the permittee must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii). The paragraphs are as follows:

- (i) There is no time limit on the use of emergency stationary RICE in emergency situations.
- (ii) The permittee may operate the emergency RICE for the purposes of maintenance checks and readiness testing, provided the tests are recommended by Federal, State or local government, the manufacturer, the vendor or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year.
- (iii) The permittee may operate the emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hour per year provided for maintenance and testing.

[40 CFR 63.6640(f)]

Recordkeeping Requirements

6.10 In accordance with 40 CFR 63.6655(e), the permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following RICE; (1) an existing stationary emergency RICE, (2) an existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

In accordance with 40 CFR 63.6655(f), an existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If engines are used for demand response, the permittee must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

All records shall be readily accessible in hard copy or electronic form for a minimum of five (5) years after the date of each occurrence, measurement, maintenance procedure, corrective action or report in accordance with 40 CFR 63.6660.

[40 CFR 63.6655(e), 63.6660]

7. COMPLIANCE ASSURANCE MONITORING – 40 CFR 64

Summary Description

The purpose of this section of the permit is to include all of the applicable requirements of 40 CFR 64, Compliance Assurance Monitoring (CAM). CAM requires selecting compliance indicators that when operated within specified ranges provide a reasonable assurance of compliance. CAM also requires monitoring, recordkeeping, and reporting requirements.

Table 7.1 lists the emissions units and pollutants that are applicable to CAM and details the monitoring requirements for each emissions unit which the permittee shall comply with. The Table also specifies the specific values that are approved to determine when an excursion has occurred.

Emissions Unit: Zurn Hog-fueled Boiler
 Regulated Pollutant(s): PM and PM₁₀
 Emission Limit(s): PM - 0.200 gr/dscf at 8% O₂, IDAPA 58.01.01.677
 PM₁₀ – 27 lb/hr and 99.48 T/yr, PTC No. P-2007.0107, Project 60629

Table 7.1 COMPLIANCE ASSURANCE MONITORING REQUIREMENTS FOR THE ZURN BOILER

	Indicator No 1	Indicator No. 2
Indicator	Pressure Drop	Scrubber Flow Rate
Measurement Approach	The ID fan outlet pressure gauge is located at the ID fan outlet just upstream of the wet scrubber inlet. It represents the pressure drop across the wet scrubber, because pressure downstream of the scrubber is zero since it exhausts to the atmosphere.	The scrubber water flow is measured using a flow meter located in the water supply header to the scrubber nozzles. Scrubber flow is determined by direct observation of the meter gauge.
Indicator Range	An excursion is defined as a pressure of less than 3.0 inches of water or greater than 7.5 inches of water.	An excursion is defined as a scrubber water flow of less than 350 gpm.
Performance Criteria		
Data Representativeness	The ID fan outlet pressure is located upstream from the wet scrubber. The monitor gauge is marked in 0.5 in. H ₂ O increments.	The scrubber water flow meter is located in the water supply header. Manufacturer's specifications indicate the gauge is accurate to +/- 5% of actual flow.
QA/QC Practices	Instrumentation is calibrated annually. It is observed daily; troubleshooting and maintenance will be initiated at any sign of questionably effective operation.	No calibration required per manufacturer's specifications. Instrument is observed daily, troubleshooting, maintenance, or replacement will be initiated at any sign of questionably effective operation.
Monitoring Frequency	The ID fan outlet pressure is monitored continuously and recorded a minimum of once per day.	The wet scrubber water flow is monitored continuously and recorded a minimum of once per day.
Data Collection Procedure	The pressure shall be manually recorded in the boiler operating log.	The flow rate shall be manually recorded in the boiler operating log.
Averaging Period	Instantaneous (never to be exceeded)	Instantaneous (never to be exceeded)

CAM Recordkeeping

- 7.1 The permittee shall conduct the monitoring required under this permit upon issuance. **[40 CFR 64.7(a)]**
- 7.2 At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. **[40 CFR 64.7(b)]**
- 7.3 Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required

intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c)]

- 7.4 Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

[40 CFR 64.7(d)]

- 7.5 For the multiclone in series with a wet scrubber and cyclone separator, if the manufacturer specifications for the monitoring devices for pressure differential and scrubbing media flow rate include calibration procedures but do not specify a calibration frequency, the device shall be calibrated at least once each calendar year.

[40 CFR 64.3(b)(1)(2)&(3)]

- 7.6 An exceedance is defined as any measured emission of PM₁₀ or PM which exceeds any corresponding emissions limit specified for the emissions unit in Table 7.1.

[40 CFR 64.6(c)(2)]

- 7.7 In accordance with 40 CFR 64.7(e), if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7(e)]

- 7.8 DEQ may require the owner or operator to develop and implement a quality improvement plan (QIP) in accordance with 40 CFR 64.8(a) if an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period occurs.

[40 CFR 64.8(a)]

- 7.9 The reports required by General Provision 24 and 25 shall include the following information for those emissions units affected by 40 CFR 64 and listed in Table 7.1:

- Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

- Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).

[40 CFR 64.9(a)(2)]

- 7.10 In accordance with 40 CFR 64.9(b), the owner or operator shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

[40 CFR 64.9(b)]

- 7.11 Should there be a conflict between 40 CFR 64 and Permit Conditions 7.1 through 7.10 of this permit, the 40 CFR 64 shall govern.

[IDAPA 58.01.01.322.02, 5/1/94]

8. INSIGNIFICANT ACTIVITIES

Summary Description

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in the Tier I operating permit to qualify for a permit shield.

Table 6.1 INSIGNIFICANT SOURCES

Emissions Unit Identification	Description	Insignificant Activities IDAPA 58.01.01.317.01(b) citation
ST1	Truck bark bin	30
ST2	Truck sawdust bin	30
ST3	Truck chip bin	30
ST4	Boiler fuel storage	30
ST5	Auxiliary fuel bin	30
ST6	Shavings truck bin	30
ST7	Log yard waste 1	30
ST8	Rock storage	30
ST9	Log yard waste 2	30
ST10	Ash storage	30
TR1	Hog in feed conveyor	30
TR2	Bark conveyor system	30
TR3	Hog out feed conveyor	30
TR4	Bark screen oversize	30
TR5	Deck trash conveyor	30
TR6	Truck bark bin conveyor	30
TR7	Boiler bark conveyor	30
TR8	Sawdust conveyor - vibrator	30
TR9	Chip oversize conveyor	30
TR10	Main fuel conveyor	30
TR11	Auxiliary fuel bin conveyor	30
TR12	Flyash transport	30
P1	Sawmill	30
P2	Small log debarker	30
P3	Large log debarker	30
P4	Bark hog	30
P5	Bark screen	30
P8	Chip screen	30
P9	Planing mill - new	30
P10	Planing mill - old	30
S1	20,000-gallon diesel fuel tank	30
S2	20,000-gallon diesel fuel tank	30
S3	20,000-gallon gasoline tank	30
S4	2,500-gallon diesel fuel tank	30

Emissions Unit Identification	Description	Insignificant Activities IDAPA 58.01.01.317.01(b) citation
S5	1,000-gallon stove oil tank	30
S6	30-gallon parts washer	30
S7	30-gallon parts washer	30
S8	30-gallon parts washer	30
S9	2,000-gallon aviation gas storage	30
S10	1,000-gallon used oil tank	30
ST8	2,000 cubic yd. Rock storage	30

8.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in facility-wide permit conditions of this permit.

9. TIER I OPERATING PERMIT GENERAL PROVISIONS

General Compliance

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)]
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)]
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

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)]
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. 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

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)]

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

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

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), and 70.7(d), (e)]
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 CAA, 42 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, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

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) and (2)]
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

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

[Idaho Code §39-108; IDAPA 58.01.01.322.15.I, 5/1/94; 40 CFR 70.6(c)(2)]

New Requirements During Permit Term

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

16. The owner or operator of a Tier I source 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

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)(ii)(A); 40 CFR 70.5(d)]

Renewal

18. a. The owner or operator of a Tier I source 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 owner or operator 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)]

- b. 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

19. 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:
- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - i. 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.
 - b. 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).
 - c. Nothing in this permit shall alter or affect the following:
 - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - iv. 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, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 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

20.
 - a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
 - b. 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.
 - c. 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.
 - d. 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

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

- b. 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;
- c. 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):
 - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator 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;
 - iii. 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
 - iv. Such information as the Department may require to determine the compliance status of the emissions unit.
- d. 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

- 22. 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

- 23. 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

- 24. 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

25. 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

26. 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

27. In accordance with IDAPA 58.01.01.332, any sudden and reasonably unforeseeable event beyond the control of the owner or operator which requires immediate corrective action to restore normal operation and which meets the definition of 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; IDAPA 58.01.01.008.06, 4/5/00; 40 CFR 70.6(g)]