



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 8, 2008

Certified Mail No. 7190 0596 0014 0000 1539

Kevin Frost
Operations Manager
Treasure Valley Forest Products
7789 S. Federal Way
Boise, ID 83716

RE: Facility ID No. 039-00009, Treasure Valley Forest Products, Mountain Home
Final Permit Letter

Dear Mr. Frost:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0165 to Treasure Valley Forest Products in Mountain Home, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on August 2, 2007. This permit is effective immediately. This permit does not release Treasure Valley Forest Products in Mountain Home from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Boise Regional Office at 1445 N. Orchard Boise, ID 83706.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Thomas Krinke, Air Quality Science Officer, at 208-373- 0419 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

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Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Jonathan Pettit at (208) 373-0443 or Jonathan.Pettit@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSJPhp

Project No. 2007.0165

Enclosures

c: Thomas Krinke, Boise Regional Office
Bill Rogers, Permit Coordinator (Ltr only)
Jonathan Pettit, Permit Writer
Marilyn Seymore/ Pat Rayne, Air Quality Division
Laurie Kral, US EPA Region 10
Permit Binder
Source File
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BF/yr	board feet per year
BF/day	board feet per day
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CF/mo	cubic feet per month
CF/yr	cubic feet per year
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
hp	horsepower
HEATLK1	Log Kiln Heater
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
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
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0165

Permittee:	Treasure Valley Forest Products
Location:	Mountain Home, Idaho

Facility ID No. 039-00009

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This is the facility's initial permit to construct (PTC).

Regulated Sources

1.2 Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Controls
2	<p><u>Drying Kilns</u> <u>Boiler No.1 (250HP)</u> Rated Heat Capacity: 8.369 MMBtu/hr Manufacturer: Kewanee Fuel: Natural Gas</p> <p><u>Boiler No. 2 (70HP)</u> Rated Heat Capacity: 2.343 MMBtu/hr Manufacturer: Cleaver Brooks Fuel: Natural Gas</p> <p><u>Lumber Kiln No. 1 (LK1)</u> Max Capacity: 10.4 MMBF/yr Operating hours: 5,000 BF/hr Production Limit: 40,000 BF/day Fuel: Natural Gas</p> <p><u>Lumber Kiln No. 2 (LK2)</u> Max Capacity: 13 MMBF/yr Operating hours: 6,250 BF/hr Production Limit: 50,000 BF/day</p> <p><u>Lumber Kiln Heaters (x2)</u> Manufacturer: Advanced Distributor Products Max Capacity: 0.145 MMBtu/hr each Hours of operation: 8760 hrs/yr Fuel: Natural Gas</p>	None
3	<p><u>Rotary Drum Dryer</u> Manufacturer: MEC Max Capacity: 35 MMBtu/hr</p>	<p><u>Rotary Drum Dryer Cyclone (RD)</u> Micron Range: 5-10 Efficiency: 90%</p>
4	<p><u>Planer and Pellet Mill</u> <u>Pellet Mill Hopper</u> Max Capacity: 10 T/yr Hours of Operation: 2080 hrs/yr</p> <p><u>Wood Chipper (CHIP)</u> Max Capacity: 2,577 lb/hr Hours of Operations: 2080 hrs/yr</p> <p><u>Chipper Screen (CHIPSCR)</u> Max Capacity: 2,577 lb/hr Hours of Operation: 2080 hrs/yr</p>	<p><u>Planer Mill and Pellet Mill Cyclones (x2) (PMC)</u> Micron Range: 5-10 Efficiency: 90%</p> <p><u>Planer Mill Baghouse (PMB)</u> Manufacturer: Murphy Rogers Size (Dia x Ht): 256 square feet</p>

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2. DRYING KILNS

2.1 Process Description

The boilers are used to generate steam used in the radiators to heat the kilns for the wood product drying process. Lumber Kiln No.1 has two 0.145 MMBTU/hr heaters that are used to augment the available heat for the drying process. All emissions from these units are vented into Lumber Kiln No.1.

2.2 Emissions Control Description

Table 2.1 BOILERS DESCRIPTION

Emissions Units / Processes	Emissions Control Device	Emissions Point
Boiler No.1	None	250HP
Boiler No.2		70HP
Lumber Kiln No. 1		8 Roof Vents
Lumber Kiln No. 2		20 Roof Vents
Lumber Kiln Heater		HEATLK1

Emissions Limits

2.3 Emission Limit

- The Formaldehyde emissions from the Drying Kiln stacks shall not exceed 0.0083 lb/yr.
- The Cadmium emissions from the Drying Kiln Stacks shall not exceed 8.77×10^{-06} lb/yr.

2.4 Opacity Limit

Emissions from the boiler stacks or any other stack, vent, or functionally equivalent opening associated with the drying kilns shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.5 Particulate Matter Emissions

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dcsf of effluent gas corrected to 3% oxygen by volume in accordance with IDAPA 58.01.01.676.

Operating Requirements

2.6 Fuel Type Limit

The facility shall combust exclusively natural gas in the drying kiln combustion units.

2.7 Throughput Limit

The permittee shall not process more than 40,000 BF/day of product in Kiln No.1. The permittee shall not process more than 50,000 BF/day of product in Kiln No.2.

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Location: Mountain Home, Idaho

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Monitoring and Recordkeeping Requirements

2.8 Kiln Throughput Limit

Each month, the permittee shall monitor and record Kiln No.1 and Kiln No.2 information in units of board feet per month (BF/mo) and board feet per the most recent consecutive 12-month period (BF/yr). Records of this information shall remain on site and shall be made available to DEQ representatives upon request in accordance with General Provision 7.

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3. ROTARY DRUM DRYER

3.1 Process Description

The rotary drum dryer dries sawdust material and transfers the dried material into an affixed cyclone at the end of the dryer.

3.2 Emissions Control Description

Table 3.1 ROTARY DRUM DRYER DESCRIPTION

Emissions Unit / Processes	Emissions Control Device	Emissions Point
Rotary Drum Dryer	Cyclone ¹	RD

¹Manufacturer control efficiency of 90%

Emissions Limits

3.3 Emissions Limits

The NO_x emissions from the Rotary Drum Dryer stack shall not exceed 2.04 lb/hr and 2.12 T/yr.

3.4 Opacity Limit

Emissions from the rotary drum dryer cyclone stack or any other stack, vent, or functionally equivalent opening associated with the rotary drum dryer shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

3.5 Fuel Type Limit

The facility shall combust exclusively natural gas in the rotary drum dryer.

3.6 Throughout Limit

The total quantity of sawdust dried in the rotary drum dryer shall not exceed 12 oven dried tons per hour.

Monitoring and Recordkeeping Requirements

3.7 Rotary Drum Dryer Throughput

Each month, the permittee shall monitor and record the following dryer production information in units of cubic feet per month (cf/mo) and cubic feet per the most recent consecutive 12-month period (cf/yr). Records of this information shall remain on site and shall be made available to DEQ representatives upon request in accordance with General Provision 7.

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4. PLANER AND PELLET MILL

4.1 Process Description

The Planer Mill receives rough cut lumber after kiln drying is complete. The planer is used to finish rough-cut lumber into dimensional lumber.

The Pellet Mill receives streams of wood shavings from the Planer Mill and wood shavings or sawdust from storage bins. The Rotary Drum Dryer dries the sawdust material and transfers the dried material into an affixed cyclone at the end of the dryer. The bulk of the dried material is conveyed to a dry material bin. From the dry material bin, the material is conveyed through a cooling system and into a cyclone, where the bulk of the cooled material is conveyed to a pelletizer. After the material is formed into wood pellets, the pellets are bagged and packaged.

4.2 Emissions Control Description

Table 4.1 PLANER AND PELLET MILL DESCRIPTION

Emissions Units/ Processes	Emissions Control Device	Emissions Point
Pellet Mill Hopper	Pellet Mill Cyclone	PMC
Wood Chipper	Planer Mill Baghouse	PMB
Chipper Screen		

Emissions Limits

4.3 Opacity Limit

Emissions from the Planer Mill and Pellet Mill stacks or any other stack, vent, or functionally equivalent opening associated with the Planner and Pellet Mills building shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

4.4 Fugitive Emissions

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

Monitoring and Recordkeeping Requirements

4.5 Reasonable Control Measures

The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions listed in Table 4.1, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittees assessment of the conditions existing at the time fugitive emissions were present (if observed), any

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corrective action taken in response to the fugitive emissions, and the date the corrective action was taken. Records of this information shall remain on site and shall be made available to DEQ representatives upon request in accordance with General Provision 7.

4.6 Visible Emissions Monitoring

To demonstrate compliance with Permit Condition 4.4, the permittee shall conduct a monthly inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittees assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken. Records of this information shall remain on site and shall be made available to DEQ representatives upon request in accordance with General Provision 7.

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5. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

[Idaho Code §39-101, et seq.]

2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4. 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 an emissions 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]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;

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- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this 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 and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

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Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. 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)]