



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

May 24, 2010

Jesse Short, Plant Manager
Idaho Forest Group LLC
P.O. Box 108
Moyie Springs, Idaho 83845

RE: Facility ID No. 021-00001, Idaho Forest Group LLC, Moyie Springs
Final Tier I Operating Permit Letter

Dear Mr. Short:

The Department of Environmental Quality (DEQ) is issuing Tier I Operating Permit No. TI-2007.0072 to Idaho Forest Group LLC at Moyie Springs in accordance with IDAPA 58.01.01.300 through 386, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed permit is effective immediately, summarizes the applicable requirements for your facility, and requires an annual compliance certification for all emissions units. This permit replaces Tier I Operating Permit No. T1-040104, issued March 7, 2005. The enclosed operating permit is based on the information contained in your permit application received on April 27, 2007, and supplemental information received on December 16, 2009 and on January 11, 2010. Modifications to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the Rules.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Coeur d'Alene Regional Office, Air Quality Analyst, at (208) 769-1422 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Harbi Elshafei at 208 373-0501 or harbi.elshafei@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

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

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/HE Permit No. TI-2007.0072

Enclosure



**Air Quality
TIER I OPERATING PERMIT**

State of Idaho
Department of Environmental Quality

PERMIT No.: T1-2007.0072
FACILITY ID No.: 021-00001
AQCR: 63 **CLASS:** A **ZONE:** 11
SIC: 2421 **NAICS:** 321113
UTM COORDINATE (km): 559.4, 5396.8

1. PERMITTEE

Idaho Forest Group LLC - Moyie Springs

2. PROJECT

Tier I Operating Permit Renewal

3. MAILING ADDRESS

P.O. Box 108

CITY

Moyie Springs

STATE

Idaho

ZIP

83845

4. FACILITY CONTACT

Jesse Short

TITLE

Plant Manager

TELEPHONE

(208) 267-3166

5. RESPONSIBLE OFFICIAL

Scott Atkison

TITLE

President

TELEPHONE

(208) 255-3220

6. EXACT PLANT LOCATION

1 mile off Old Highway 2

COUNTY

Boundary

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Stud lumber production

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.

HARBI ELSHAFEI, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:	May 24, 2010
DATE MODIFIED/AMENDED:	
DATE EXPIRES:	May 24, 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
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EFB	Electrified Filter Bed
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
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
MACT	Maximum Achievable Control Technology
MMBF/yr	million board feet per any consecutive 12-calendar month period
MMBtu	million British thermal units
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
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
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	tons per year
TAP	toxic air pollutants
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

1. TIER I OPERATING PERMIT SCOPE

Purpose

- 1.1 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 permitting action is a Tier I operating permit renewal in accordance with IDAPA 58.01.01.369.
- 1.3 This Tier I permit incorporates the following permit(s):
- Permit to Construct (PTC) No. P-030119, issued August 18, 2003.
 - Permit to Construct and Tier II Operating Permit No. T2-050113, August 31, 2009
- 1.4 This Tier I operating permit supersedes the following permit(s):
- Tier I Operating Permit No. T1-040104, issued March 7, 2005
 - Tier I Operating Permit No. T1-030133, issued March 17, 2004
 - Tier I Operating Permit No. 021-00001, issued to Louisiana-Pacific Corporation on October 29, 2002.

Regulated Sources

- 1.5 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
2	<u>Facility-Wide Conditions</u>	None
3	<u>Hog Fuel Boiler</u> Manufacturer: Kipper and Sons Model: 1018 Date installed: 1972 Rated heat capacity: 128 MMBtu/hr Rated steam capacity: 80,000 pounds steam per hour Burner type: spreader stoker Fuel: woodwaste Stack flow rate: 46,000 acfm <u>EFB Disengagement Chamber</u>	<u>Multiclone</u> Manufacturer: Joy Manufacturing Efficiency: 95% for PM <u>Electrified Filter Bed (EFB)</u> Manufacturer: EFB, Inc. Model No: FDC 50 particulate control system Efficiency: > 98% for PM The PM emissions from cleaning the EFB filter media are controlled by the EFB baghouse, which has an approximate PM ₁₀ control efficiency of 99.8%.
4	<u>Dry Kilns (4 total)</u> . Kilns Nos. 1-3 were manufactured by Moore; kiln No. 4 was manufactured by Coe	None
5	<u>Planermill (2 planers)</u>	Each planermill is controlled by a cyclone and a baghouse. Each baghouse has an estimated PM control efficiency of > 99%. Baghouse manufacturers: Donaldson and Company; Donaldson-Day (Torit) Model Nos.: 376RF8; 276-RFW-10
7	<u>Insignificant Activities</u>	None

2. FACILITY-WIDE CONDITIONS

Table 2.1 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 Emissions	Reasonable control	IDAPA 58.01.01.650-651	2.2, 2.3, 2.4, 2.11, 2.12
2.5	Odors	No emissions of odorous gas, liquids, or solids	IDAPA 58.01.01.775-776	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	2.9-2.9.5, 2.11, 2.12
2.10	Criteria air pollutants, opacity	Performance Testing	IDAPA 58.01.01.157 and 322.06, .08.a, .09	2.10, 2.12
2.13	Fuel-burning Equipment	Grain-loading standard	IDAPA 58.01.01.676-677	2.11, 2.12
2.14	Sulfur content	Compliance with IDAPA 58.01.01.728-729	IDAPA 58.01.01.728-729	2.14.1, 2.11, 2.12
2.15	Open Burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600-623	2.11, 2.12
2.16	Renovation or Demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	2.11, 2.12
2.17	Chemical accidental release	Compliance with 40 CFR 68	40 CFR 68	2.11, 2.12
2.18	Recycling and emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	2.11, 2.12
2.19	PM	Process weight	IDAPA 58.01.01.701	2.11, 2.12, 2.20

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 monthly 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 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 monthly 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
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, Idaho 83814
Phone: (208) 769-1422

Fax: (208) 769-1404

[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
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, Idaho 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

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, 0.100 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.200 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 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]

Asbestos

- 2.16 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M – Asbestos.

[40 CFR 61, Subpart M]

Regulated Substances for Accidental Release Prevention

- 2.17 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

2.18 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]

2.19 Particulate Matter – Process Weight Limitations

- The permittee shall not emit to the atmosphere from any process or process equipment operating on or after October 1, 1979, PM 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 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 9,250 lb/hr,

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

- The permittee shall not emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM 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 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

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

[IDAPA 58.01.01.700, 5-3-03]

PTC/T2 General Provision

2.20 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.

[PTC/T2 General Provision, 8/31/09]

3. HOG FUEL-FIRED BOILER

Summary Description

The following is a narrative equipment description of hog fuel-fired boiler regulated in this Tier I operating permit, and is included for informational purposes.

The boiler is manufactured by Kipper and Sons, and is a spreader-stoker with a maximum rated designed capacity of 80,000 pounds of steam per hour or 128 MMBtu/hr. The boiler is fueled primarily with hog fuel (i.e., sawdust, bark, and woodwaste). All fuel types are mixed in a fuel mix bin prior to being pneumatically conveyed to one of two fuel storage bins. From the fuel storage bins, the fuel is chain-fed to the spreader stoker. The hog fuel boiler provides steam to heat the facility's dry kilns and the facility's production buildings. The boiler was installed in 1972. The boiler is not subject to New Source Performance Standards (NSPS) because the construction date of the boiler predates all applicable NSPS regulations.

Emissions resulting from combustion of hog fuel in the boiler are first routed to a high efficiency multiclone. Ash and partially combusted wood fiber are separated by the multiclone and are reintroduced into the boiler firebox. Following the multiclone, the uncollected fine dust and smoke particles are removed in an electrified filter bed (EFB) dust collector. In this system, the fine dust particles are given an electrostatic charge in a corona ionizer and are then deposited onto the surface of electrically polarized gravel. The cleaned air stream is vented through the boiler's EFB stack. The spent pea gravel is removed from the filtration region of the EFB and is cleaned externally in a pneumatic conveyor. Dust removed from the pea gravel is filtered in a small baghouse (EFB baghouse). Emissions exiting the EFB baghouse exit to the atmosphere through the EFB baghouse vent.

Table 3.1 describes the devices used to control emissions from the hog fuel-fired boiler.

Table 3.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Hog fuel-fired boiler	High efficiency multiclone and electrified filter bed (EFB) in series
EFB Disengagement Chamber	The EFB disengagement chamber emissions are controlled by a baghouse with efficiency 99.8% for PM ₁₀

Table 3.2 contains only a summary of the requirements that apply to the hog fuel-fired 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 ₁₀ CO	<u>EFB primary stack</u> : PM ₁₀ : 6.51 lb/hr; 28.5 T/yr CO: 391 T/yr <u>Disengagement stack</u> : PM ₁₀ : 0.18 lb/hr, 0.79 T/yr	PTC/T2 No. T2-050113	3.4, 2.10, 2.11, 3.12
3.2	Visible emissions	20 % opacity for no more than three minutes in any 60-minute period.	IDAPA 58.01.01.625	2.8
3.3 (Boiler)	PM	0.20 gr/dscf at 8% O ₂ for woodwaste burning equipment	IDAPA 58.01.01.677	3.4, 2.10, 2.11, 3.12
3.4	Steaming rate	391 million pounds steam per any consecutive 12-month calendar period	PTC/T2 No. T2-050113	3.6, 3.13
3.5	EFB voltage, current, and filter bed temperature	Manufacturer and O&M manual specifications	PTC/T2 No. T2-050113	3.7, 2.11, , 3.14, 3.15
3.12	PM/PM ₁₀	Performance test	PTC/T2 No. T2-050113	3.17

Permit Limits / Standard Summary

3.1 PM₁₀ and CO Emissions Limits

- The PM₁₀ and CO emissions from the boiler EFB primary stack shall not exceed any corresponding emissions rate limits listed in Table 3.3.
- The PM₁₀ emissions from the boiler’s EFB disengagement chamber stack shall not exceed any corresponding emissions rate limits listed in Table 3.3.

Table 3.3 HOG FUEL BOILER EMISSIONS LIMITS¹

Source Description	PM ₁₀ ²		CO
	lb/hr ³	T/yr ⁴	T/yr ⁴
Boiler - EFB primary stack	6.51	28.5	391.0
Boiler – disengagement chamber stack	0.18	0.79	--

- 1) In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and recordkeeping requirements.
- 2) Particulate matter with and aerodynamic diameter less than or equal to a nominal ten (10) micrometers including condensable particulate as defined in IDAPA 58.01.01.006.80.
- 3) Pounds per hour. As determined by source test methods prescribed by IDAPA 58.01.01.157.
- 4) Tons per consecutive 12-calendar month period.

[PTC/T2 No. T2-050113, 8/31/09]

3.2 In accordance with IDAPA 58.01.01.677, the permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.20 gr/dscf of effluent gas corrected to 8% oxygen by volume when burning wood product.

[PTC/T2 No. PTC T2-050113, 8/31/09]

3.3 The permittee shall comply with permit condition 2.7.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

3.4 The boiler shall not produce more than 391 million pounds of steam per any consecutive 12-month calendar period.

[PTC/T2 No. T2-050113, 8/31/09]

3.5 The permittee shall install, calibrate, maintain, and operate, in accordance with the O&M manual specifications, equipment to continuously measure the EFB filter bed voltage, EFB filter bed current, and EFB filter bed temperature to control PM and PM₁₀ emissions from the EFB primary stack.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.322.06, 5/1/94]

3.6 The permittee shall install, calibrate, and maintain a monitor to continuously measure the steam production rate of the hog fuel boiler. Steam production rate records shall be maintained in accordance with Permit Condition 2.11.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.322.06, 5/1/94]

3.7 The permittee shall develop and maintain an Operational and Maintenance (O&M) manual that establishes operating ranges for the EFB operating parameters for the control of the PM and PM₁₀ emissions from the boiler primary stack. The O&M manual shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual. The O&M manual shall describe the

procedures that the permittee shall use to maintain the EFB in good working order and to operate the EFB as efficiently as practicable and in accordance with the manufacturer specifications for the EFB. At a minimum the O&M manual must establish the following: voltage, amperage, and temperature operating ranges for the EFB filter bed including the averaging periods. The O&M manual must also address voltage, amperage, and the filter bed temperature monitoring procedures to determine whether the EFB filter bed is operating as designed. The manual must be updated after each performance test conducted in accordance with Permit Condition 3.12. Each updated manual shall establish ranges with averaging periods for operating parameters consistent with those achieved during the performance test, which demonstrated compliance. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the O&M manual are incorporated by reference to this permit and are enforceable permit conditions.

The O&M manual shall be submitted to DEQ at the following address. Any changes made to the O&M manual shall also be submitted to DEQ within 15 days of the change to the following address:

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

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.322.06, 5/1/94]

- 3.8 The permittee shall install and operate a baghouse to control PM and PM₁₀ emissions from the EFB disengagement chamber stack.

[PTC/T2 No. T2-050113, 8/31/09]

- 3.9 The permittee shall develop and maintain a baghouse procedures document for the inspection and operation of the baghouse which controls emissions from the EFB disengagement chamber stack. The baghouse procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The baghouse procedures document shall describe the procedures that will be followed by the permittee to comply with Permit Condition 2.20 and maintain the baghouse in good working order and to operate the baghouse as efficiently as practicable. The permittee shall maintain all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

The baghouse procedures document shall contain requirements for monthly see-no-see visible emissions inspections of the baghouse. The inspections shall occur during daylight hours and under normal operating conditions.

The baghouse procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at anytime. At a minimum the document shall include:

- procedures to determine if bags are ruptured; and
- procedures to determine if bags are not appropriately secured in place.

The permittee shall maintain records of the results of each baghouse inspections in accordance with Permit Condition 2.11. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The baghouse procedures document shall be submitted to DEQ for review and comment and shall contain a certification by a responsible official. Any changes to the baghouse procedures document shall be submitted within 15 days of the change.

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

The operating and monitoring requirements specified in the baghouse procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.322.06, 5/1/94]

- 3.10 The operating parameters for voltage, amperes, and filter bed temperature of the EFB shall be maintained within the O&M manual specifications.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.322.06, 5/1/94]

- 3.11 The permittee shall remove the chip surge bin and the hog fuel mix bin cyclones and their associated stacks, as requested by the permittee.

[PTC/T2 No. T2-050113, 8/31/09]

Monitoring and Recordkeeping Requirements

- 3.12 The permittee shall conduct a performance tests to measure PM and PM₁₀ emissions from the boiler EFB primary stack to demonstrate compliance with the Permit Conditions 3.1 and 3.2. The performance test shall be conducted by March 2, 2010 to determine compliance with Permit Conditions 3.1 and 3.2. The performance test shall be conducted under worst case normal conditions as required by IDAPA 58.01.01.157 and Permit Condition 2.10, and the performance test report shall contain documentation that the test was conducted under these conditions. The permittee is encouraged to submit a source testing protocol for approval 30 days prior to conducting the performance test. The permittee shall monitor and record the following information during the performance testing:

- Visible emissions, using methods and procedures contained in IDAPA 58.01.01.625.
- Steam produced by the boiler in pounds steam per hour.
- EFB filter-bed voltage, current, and temperature; and the EFB ionizer voltage and current.

Subsequent compliance tests shall be conducted according to the following schedule:

- If the PM/PM₁₀ emissions measured during the performance test are less than or equal to 75% of the PM/PM₁₀ emissions limit listed in Permit Conditions 3.1 and 3.2, a subsequent compliance test shall be conducted within five years of the test date.
- If the PM/PM₁₀ emissions measured during the performance test are greater than or equal to 75% but less than or equal to 90% of the PM/PM₁₀ emissions limit listed in Permit Conditions 3.1 and 3.2, a subsequent compliance test shall be conducted within two years of the test date.

If the PM/PM₁₀ emissions measured during the performance test are greater than 90% of the PM/PM₁₀ emissions limit listed in Permit Condition 3.1 and 3.2, a subsequent compliance test shall be conducted within 12-calendar months of the test date.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.322.06, 5/1/94]

- 3.13 The permittee shall monitor and record the boiler's steam production monthly and annually to demonstrate compliance with Permit Condition 3.4. Steam production shall be compiled using units of pounds steam per hour. Annual boiler steam production shall be determined by summing monthly steam

production rates over the previous consecutive 12-calendar months period. This information shall be maintained in accordance with Permit Condition 2.11.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.322.06, 5/1/94]

- 3.14 The permittee shall monitor and record continuously the EFB ionizer voltage and amperage; and the EFB filter-bed voltage, current, and temperature while the EFB is operating. This information shall be maintained in accordance with Permit Condition 2.11.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.322.06, 5/1/94]

- 3.15 The permittee shall maintain records of the results of the continuous EFB ionizer voltage and current; and EFB filter-bed temperature, voltage, and current, in accordance with Permit Condition 2.11.

[PTC/T2 No. T2-050113, 8/31/09]

- 3.16 The permittee shall monitor and record the visible emissions in accordance with Permit Condition 2.8.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.322.06, 5/1/94]

Reporting Requirements

- 3.17 The permittee shall report the results of the performance tests required in Permit Condition 3.12 to DEQ in a written report to be received no later than 30 days after completion of the test unless a different time period is approved in writing by DEQ. If additional performance testing is conducted, it shall be conducted in accordance with Permit Condition 3.12, and the permittee shall report the results to DEQ in a written report to be received no later than 30 days after completion of the test unless a different time period is approved in writing by DEQ.

[PTC/T2 No. T2-050113, 8/31/09]

4. DRY KILNS – FOUR TOTAL

Summary Description

The following is a narrative equipment description of the four dry kilns regulated in this Tier I operating permit, and is included for informational purposes.

The facility has four dry kilns used to dry green lumber. The kilns were manufactured either by Moore or Coe. The dry kilns are heated using steam supplied by the facility's hog fuel-fired boiler

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

Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Dry kilns – four total	None

Table 4.2 contains only a summary of the requirements that apply to the dry 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	PM ₁₀	34.8 lb/day; 5.0 T/yr	PTC/T2 No. T2-050113	4.3, 2.10, 2.11
4.1	VOC	61.7 T/yr	PTC/T2 No. T2-050113	4.3, 2.10, 2.11
4.2	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	PTC/T2 No. T2-050113	2.8, 2.11, 4.5
4.3	Lumber throughput	199 MMBF/yr	PTC/T2 No. T2-050113	4.4, 2.11

Permit Limits / Standard Summary

4.1 PM₁₀ and VOC Emissions Limits

- The combined PM₁₀ emissions from the four dry kiln vents shall not exceed any corresponding emissions rate limits listed in Table 4.3.
- The combined VOC emissions from the four dry kiln vents shall not exceed any corresponding emissions rate limits listed in Table 4.3.

Table 4.3 DRY KILNS – FOUR TOTAL EMISSIONS LIMITS¹

Source Description	PM ₁₀ ²		VOC
	lb/day ³	T/yr ⁴	T/yr ⁴
Dry kilns – four total	34.8	5.0	61.7

- 1) In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and recordkeeping requirements.
- 2) Particulate matter with and aerodynamic diameter less than or equal to a nominal ten (10) micrometers including condensable particulate as defined in IDAPA 58.01.01.006.80.
- 3) Pounds per calendar day.
- 4) Tons per consecutive 12-calendar month period.

[PTC/T2 No. T2-050113, 8/31/09]

4.2 The permittee shall comply with Permit Condition 2.7.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.625, 4/5/00]

Operating Requirements

4.3 Lumber Throughput

The maximum green lumber throughput to the four dry kilns shall not exceed 199 million board feet per any consecutive 12-calendar month period (MMBF/yr).

[PTC/T2 No. T2-050113, 8/31/09]

Monitoring and Recordkeeping Requirements

4.4 Throughput Monitoring

The permittee shall monitor and record, monthly and annually, the green lumber throughput to the four dry kilns. Throughput shall be recorded as million board feet. Annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-calendar month period.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.322.06, 5/1/94]

4.5 Opacity Monitoring

The permittee shall monitor and record the visible emissions in accordance with Permit Condition 2.8.

[PTC/T2 No. T2-050113, 8/31/09 IDAPA 58.01.01.322.06, 5/1/94]

5. PLANER MILL

Summary Description

After drying in the kilns, lumber is planed to final dimensions in the planer mill in one of two high speed planers (Stetson or Newman). Shavings from each of the planers are pneumatically transferred to overhead truck bins through separate cyclonic collectors, followed by rotary air locks and baghouses. Tier II operating permit No. T2-050113 was issued to the facility for the Stetson planer mill on August 31, 2009.

The planed lumber is then trimmed to marketable length. Trim ends are reduced in a hog and are pneumatically transferred to the overhead truck shavings bins along with the shavings. The lumber is then graded, inked, stacked, and banded. The lumber is then stored until it is shipped off-site by rail or truck.

Table 5.1 describes the devices used to control emissions from the planer mills.

Table 5.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Unit / Process	Emissions Control Device
Stetson planer	Cyclone followed by a baghouse
Newman planer	Cyclone followed by a baghouse

Table 5.2 contains only a summary of the requirements that apply to the planer mills. 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	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	PTC/T2 No. T2-050113	2.8, 2.11, 5.2

Permit Limits / Standard Summary

- 5.1 The permittee shall comply with Permit Condition 2.7.
[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.625, 4/5/00]
- 5.2 The permittee shall develop for each of the baghouse procedure documents for the inspection and operation of the baghouses which controls the PM and PM₁₀ emissions from the Stetson planer mill and for the Newman planer mill stacks. The baghouse procedure documents shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The baghouse procedure documents shall describe the procedures that will be followed by the permittee to comply with Permit Condition 2.20 and maintain the baghouse in good working order and to operate each of the baghouse as efficiently as practicable. The permittee shall maintain all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

The baghouse procedure documents shall contain requirements for monthly see-no-see visible emissions inspections of the baghouses. The inspections shall occur during daylight hours and under normal operating conditions.

The baghouse procedure documents shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from each of the baghouse at anytime. At a minimum the document shall include:

- procedures to determine if bags are ruptured; and
- procedures to determine if bags are not appropriately secured in place.

The permittee shall maintain records of the results of each baghouse inspections in accordance with Permit Condition 2.11. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The baghouse procedures documents shall be submitted to DEQ for review and comment and shall contain a certification by a responsible official. Any changes to the baghouse procedures document shall be submitted within 15 days of the change.

The baghouse procedure documents shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the baghouse procedure documents are incorporated by reference to this permit and are enforceable permit conditions.

[PTC/T2 No. T2-050113, 8/31/09, IDAPA 58.01.01.322.06, 5/1/94]

Monitoring and Recordkeeping Requirements

5.3 The permittee shall monitor and record the visible emissions in accordance with Permit Condition 2.8.

[IDAPA 58.01.01.322.06, 5/1/94, IDAPA 58.01.01.625, 4/5/00]

6. 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 Compliance Assurance Monitoring (CAM), 40 CFR 64. The CAM requires selecting compliance indicators, that when operated within specified ranges, provide a reasonable assurance of compliance, it also requires monitoring, recordkeeping, and reporting requirements.

6.1 Table 6.1 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.

Table 6.1 SUMMARY OF COMPLIANCE ASSURANCE MONITORING

Emission Unit/ Pollutant	40 CFR 64.2(a)(1), Emissions Limits and Standards	40 CFR 64.2(a)(2), control used for compliance	40 CFR 64.6(c)(1)(i), Indicator and indicator ranges	40 CFR 64.3(b)(1), (2), (3), (4), Performance criteria	40 CFR 64.6 (Devices to measure indicators) and 40 CFR 64.9 (CAM Reporting and Recordkeeping)
Hog fuel boiler PM/PM ₁₀	<u>PM</u> Grain loading, 0.200 gr/dscf at 8% O ₂ , IDAPA 58.01.01.677 <u>PM₁₀</u> PTC No. T2- 050113, 6.51 lb/hr and 28.5 T/yr	EFB	<u>EFB</u> Operating parameters: - ionizer current, ionizer voltage, filter bed voltage, and filter bed current - filter bed temperature Ranges: - Ionizer current: 1.0-2.5 milliamperes (mA) - Ionizer voltage: 10-40 kilovolts (kV) - Filter bed voltage: 4-9.5 kV - Filter bed current: 0-0.35 mA - Filter bed temperature: greater than 150 °F If filter bed temperature drops below 150 °F, an alarm sounds and the EFB shuts down.	<u>EFB parameters and measurement location:</u> - ionizer current and ionizer voltage are measured at the ionizer electrode - filter bed current and filter bed voltage are measured at the filter bed electrode - filter bed temperature is measured with a thermocouple at the beginning of the outlet plenum, where the gas streams from the two towers combine. <u>QA/QC:</u> EFB annual maintenance or per manufacturer recommendations. <u>Monitoring frequency:</u> Continuous and recorded hourly (20 minimum of 24 hourly readings recorded.)	<u>EFB</u> Devices to measure: - Ionizer current and filter bed current: ammeters - ionizer voltage and filter bed voltage: voltmeter - filter bed temperature: thermostat control in filter bed; thermocouple in the combined gas streams exiting the filter beds - Averaging period: instantaneous <u>CAM Recordkeeping</u> The recordkeeping shall include the following: - Number, duration, and cause of excursions and exceedances. - Number, duration, and cause of monitor downtime - Description of actions to implement at QIP-see permit condition 6.7
Boiler disengagement chamber stack PM ₁₀	<u>PM₁₀</u> PTC No. T2- 050113, 0.18 lb/hr and 0.79 T/yr	<u>Baghouse</u>	<u>Baghouse</u> Operating parameters: Permittee shall conduct a see/no see VE observation from boiler's disengagement chamber stack	<u>Parameters and measurement location:</u> Baghouse stack <u>QA/QC:</u> Baghouse annual maintenance or per manufacturer recommendations <u>Monitoring frequency:</u> At least once per day for VE observation	<u>Baghouse</u> - visible emissions (VE) - average period: once per day Devices to measure: - see/no see for VE observation - an excursion is defined as any VE observed from the disengagement chamber stack <u>CAM Recordkeeping</u> The recordkeeping shall

Emission Unit/ Pollutant	40 CFR 64.2(a)(1), Emissions Limits and Standards	40 CFR 64.2(a)(2), control used for compliance	40 CFR 64.6(c)(1)(i), Indicator and indicator ranges	40 CFR 64.3(b)(1), (2), (3), (4), Performance criteria	40 CFR 64.6 (Devices to measure indicators) and 40 CFR 64.9 (CAM Reporting and Recordkeeping)
					include the following: - Number, duration, and cause of excursions and exceedances. - Number, duration, and cause of monitor downtime - Description of actions to implement at QIP-see permit condition 6.7

[40 CFR 64]

- 6.2 The permittee shall conduct the monitoring required under this permit upon issuance. [40 CFR 64.7(a)]
- 6.3 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)]
- 6.4 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)]
- 6.5 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)]
- 6.6 After approval of monitoring under 40 CFR 64, 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 DEQ and, if necessary, submit a proposed modification to this 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)]

- 6.7 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)]

- 6.8 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 6.1:

- 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)]

- 6.9 Should there be a conflict between 40 CFR 64 and Permit Conditions 6.1 through 6.8 of this permit, the 40 CFR 64 shall govern.

[IDAPA 58.01.01.322.02, 5/1/94]

7. INSIGNIFICANT ACTIVITIES

Activities and emission units identified as insignificant under IDAPA 58.01.01.317.01(b) are listed in Table 7.1 to qualify for a permit shield.

Table 7.1 INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(I) Citation
Storage tanks with lids or closure less than 260 gallons	317.01.b.i.1
Storage tanks less than 1,100 gallons, no HAPs, maximum vapor pressure 550 mmHg	317.01.b.i.2
VOC storage tank less than 10,000 gallons, with lid or closure, vapor pressure less than 80 mmHg at 21 degrees Celsius; and gasoline storage tanks with lid or closure less than 10,000 gallons	317.01.b.i.3
Butane, propane and LPG storage tank less than 40,000 gallons	317.01.b.i.4
Combustion source less than 0.50 MMBtu/hr fired with either kerosene, No. 1 and No. 2 fuel oil	317.01.b.i.7
Waste paper incinerator less than 0.50 MMBtu/hr	317.01.b.i.8
Welding less than 1 T/day of welding rod	317.01.b.i.9
Printing using less than 2 gallons of ink	317.01.b.i.12
Surface coating, containing less than 1% by weight VOC's	317.01.b.i.25

- 7.1 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the Facility-wide Permit Conditions.

8. 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.

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.l, 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)(iii)(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, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.
[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]