



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

July 28, 2003

Certified Mail No. 7099 3220 0009 1976 1449

Dick Willhite
Plant Superintendent
Bennett Forest Industries, Inc.
P.O. Box 389
Elk City, ID 83525

RE: AIRS Facility No. 049-00001, Bennett Forest Industries Inc., Elk City
Final Tier II Operating Permit

Dear Mr. Whillhite:

The Department of Environmental Quality (Department) is issuing Tier II Operating Permit No. T2- 049-00001 for the Bennett Forest Industries Inc. Elk City in accordance with IDAPA 58.01.01.400 through 406, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Tier II operating permit is based on the information contained in your permit application and on the relevant comments received during the public comment period. Modification to and/or renewal of this Tier II permit shall be requested in a timely manner in accordance with the *Rules*.

Eric Kopczinski of the Lewiston Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations 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 Daniel Salgado at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Allred".

C. Stephen Allred, Director
Department of Environmental Quality

CSA/MJS/sd Permit No. T2-9512-147-1

Enclosure

Bennett Forest Industries Inc., Elk City
Final Tier II Operating Permit, July 25, 2003
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cc: Eric Kopczinski, Lewiston Regional Office
Sherry Davis, Air Quality Division
Phyllis Heitman, (Ltr Only)
Reading File, (Ltr Only)



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

PERMIT NO.: T2-9512-147-1
AIRS FACILITY NO.: 049-00001
AQCR: 63 **CLASS:** SM
SIC: 2421 **ZONE:** 11
UTM COORDINATE (km): 618.0 , 5073.6

1. PERMITTEE

Bennett Forest Industries, Inc.

2. PROJECT

Tier II Operating Permit (Synthetic Minor)

3. MAILING ADDRESS

P.O. Box 389

CITY

Elk City

STATE

ID

ZIP

83525

4. FACILITY CONTACT

Dick Willhite

TITLE

Plant Superintendent

TELEPHONE

208-842-2214

5. RESPONSIBLE OFFICIAL

John Bennett

TITLE

General Manager

TELEPHONE

208-983-0012

6. EXACT PLANT LOCATION

3 miles west of Elk City on Highway 14, Marker 46

COUNTY

Idaho

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Sawmill - Lumber

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200.

C. STEPHEN ALLRED, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 28, 2003

DATE EXPIRES: July 28, 2008

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
ASTM	American Society of Testing and Materials
Btu	British thermal unit
Btu/lb	British thermal units per pound
CO	carbon monoxide
gr/dscf	grain (1 lb = 7,000 grains) per dry standard cubic feet
IDAPA	Idaho Administrative Procedures Act
lb/hr	pound per hour
lb/MMBtu	pound per million British thermal units
MMbf	million board feet
NO _x	nitrogen oxides
O&M	operations and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter of 10 micrometers or less
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-9512-147-1

Permittee: Bennett Forrest Industries	AIRS Facility No. 049-00001	Date Issued: July 28, 2003
Location: Elk City, Idaho		Date Expires: July 28, 2008

1. TIER II OPERATING PERMIT SCOPE

Purpose

- 1.1 The purpose of this Tier II permit is to limit facility emissions below major facility classification for Title V and to protect ambient air quality standards.
- 1.2 This Tier II permit replaces no other permits.

Regulated Sources

- 1.3 Table 1.1 lists all regulated sources with specific permit conditions.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2,3	Two hog fuel boilers: Stirling, Model Watertube Four Drum, 34.5 Mlb/hr steam combined. common stack, 80 ft height.	None
4	Drying Kiln No. 0: LSI Model DBL-Track, 3.739 MBF/hr (max).	None
4	Drying Kiln No. 1: Owner manufacturer model single-track, 1.863 MBF/hr (max).	None
4	Drying Kiln No. 2: Owner manufacturer model single-track, 1.863 MBF/hr (max).	None
4	Drying Kiln No. 3: Lovestead model. This unit is no longer in operation.	None
4	Drying Kiln No. 4: LSI model DBL-track, 3.739 MBF/hr (max).	None
2,5	Sawdust cyclone: Western Pneumatics model 9.5', 0.157 BDT/hr (max).	None
2,5	Chip cyclone: Unknown manufacturer, Model 7.0', 9.447 BDT/hr (max).	None
2,5	Shavings cyclone: Unknown manufacturer Model 12.0', 1.044 BDT/hr (max).	None
2,5	Shavings cyclone: Unknown manufacturer Model 9.0', 1.044 BDT/hr (max).	None
2	Wood product handling to trucks: sawdust bin, bark bin, shaving bin and chip bin.	None
2,6	Fire pump engine and emergency standby generator.	None

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2. FACILITY-WIDE CONDITIONS

Fugitive Dust

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with Idaho IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 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.
- 2.4 The permittee shall conduct quarterly facility-wide inspection of potential sources of fugitive dust, 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 quarterly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Visible Emissions

- 2.5 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 (NO_x), and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

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2.6 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. 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 quarterly 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 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.

Excess Emissions

2.7 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.

Open Burning

2.8 The permittee shall comply with the requirements of the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

Odors

2.9 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

2.10 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Fuel-burning Equipment

2.11 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.080 grains per dry standard cubic feet (gr/dscf) of effluent gas corrected to 8% oxygen by volume for wood products for fuel burning equipment commencing operation on or after October 1, 1979, and 0.200 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products for fuel burning equipment commencing operation prior to October 1, 1979.

Sulfur Content

2.12 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- American Society of Testing and Materials (ASTM) Grade 1 fuel oil - 0.3% by weight.

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- ASTM Grade 2 fuel oil - 0.5% by weight.
- ASTM Grades 4, 5 and 6 fuel oil – 1.75% by weight

Performance Testing

2.13 For each performance test required by this permit, the permittee shall provide notice of intent to test to the Department at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests that 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 Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by the Department for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to the Department, 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

Within 30 days following the date in which a compliance test required by this permit is concluded, the permittee shall submit to the Department a compliance test report for the respective test. The compliance test report shall include a description of the process, identification of the method 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.

Monitoring and Recordkeeping

2.14 The permittee shall maintain sufficient records to ensure 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 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 Department representatives upon request.

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Reports and Certifications

- 2.15 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, 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. Any reporting required by this permit shall be submitted to the following address:

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

Obligation to Comply

- 2.16 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

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3. STIRLING HOG FUEL BOILERS

3.1 Process Description

The two four-drum water-tube boilers installed in 1957 are hog-fuel dutch-oven boilers designed by Stirling. The two boilers have a combined potential steam production rate of 34,500 pounds per hour (lb/hr) saturated steam, which is used primarily for the drying kilns. The boilers are fired by bark, sawdust, and wood shavings. Flue gases from the two Stirling boilers converge and are exhausted to the atmosphere through one 80-foot tall stack.

Emissions Limits

3.2 Emissions Limits

The permittee shall limit emissions of particulate matter with an aerodynamic diameter of 10 micrometers or less (PM₁₀) and carbon monoxide (CO) from both Stirling boilers to less than the corresponding emissions rate limits listed in Appendix A of this permit.

Operating Requirements

3.3 Fuel Type

The permittee shall fire the Stirling boilers exclusively with wood products.

3.4 Fuel Throughput Limits

The permittee shall not feed wood products to the Stirling boilers in amounts exceeding 29,000 green tons per any consecutive 12-month period.

3.5 Fuel Heating Value Limitations

The permittee shall limit the weighted average of the lower heating value of all wood products burned in the boilers to 5,650 British thermal units per pound (Btu/lb) per consecutive 12-month period.

Monitoring and Recordkeeping Requirements

3.6 Fuel Characterization Testing

Within 24 months from the issuance date of this permit, the permittee shall calculate the British thermal unit (Btu) content (i.e. lower heating value) of each fuel burned in either of the two boilers in the following manner:

- Collect at least five samples of each type of fuel burned in the boilers.
- Analyze each sample for Btu.
- Determine the true mean Btu content of each fuel using the statistical analysis approved by the Department.

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- If fuels are combined prior to burning in the boiler, the permittee shall determine the weighted arithmetic average Btu content of the mixed fuel by multiplying the true mean by the approximate weight percentage of the fuel in the mixture.

3.7 Performance Testing Requirements

Within 24 months from the issuance date of this permit, the permittee shall conduct performance tests to measure opacity, PM, and PM₁₀ emissions from the Stirling boilers at the common stack. Performance testing and reporting shall follow the procedures listed in Permit Condition 2.13. The results of the opacity test shall be used to verify compliance with Permit Condition 2.5. The results of the PM testing shall be used to verify compliance with the grain-loading standard in Permit Condition 2.11. The results of the PM₁₀ testing shall be used to verify compliance with the hourly PM₁₀ emission limit in Permit Condition 3.2.

The following conditions shall apply during the performance testing:

- The permittee shall operate both boilers at least at 80% of operating design capacity. The operating design capacity for each boiler shall be listed in the test report.
- The amount of wood fuel burned by both boilers shall be monitored and recorded during the test.
- The Btu content of the wood fuel shall be determined according to Permit Condition 3.6.
- Steam production of the boilers shall be monitored and recorded during the test.

If the PM emissions measured in the initial performance test are less than or equal to 75% of the grain-loading standard listed in Permit Condition 2.11, no further PM testing shall be required during the permit term. If the PM emissions measured during the initial performance test are greater than 75% but less than or equal to 90% of the grain-loading standard, the permittee shall conduct a second performance test during the third calendar year of the permit term. If the PM emissions measured during the initial performance test are greater than 90% of the grain-loading standard, the permittee shall conduct a performance test during each calendar year of the permit term. There shall be a minimum of three months between annual performance tests.

Unless otherwise notified by the Department, subsequent testing for opacity and PM₁₀ emissions from the Stirling boilers will be determined during the next permit renewal process.

3.8 Emission Factor Verification Testing

Within 24 months from the issuance date of this permit, the permittee shall conduct performance tests to verify the CO emission factor from the Stirling boilers at the common stack. Performance testing and reporting shall follow the procedures listed in Permit Condition 2.13. The results of the CO testing shall be reported in pounds emitted per million British thermal units of fuel to compare with the CO emission factor used to establish synthetic minor permit status (0.6 pound per million British Thermal Units (lb/MMBtu)).

If the CO emission factor determined by the performance test exceeds 0.6 lb/MMBtu, the permittee shall use the emission factor determined by the performance test to calculate CO emissions for the preceding 12-month period to verify compliance with Permit Condition 3.2.

Unless otherwise notified by the Department, subsequent testing for CO emissions from the Stirling boilers will be determined during the next permit renewal process.

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3.9 Wood Fuel Monitoring

At the end of each calendar month, the permittee shall monitor and record the following information:

- The total wood fuel usage of the Stirling boilers for the preceding 12-month period, in tons per consecutive 12-month period.
- The weighted average of the lower heating value of all wood products burned for the preceding 12-month period, in Btu/lb.

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4. DRYING KILNS

4.1 Process Description

There are four drying kilns permitted for operation at the facility. The permittee refers to these kilns as Kiln No. 0, Kiln No. 1, Kiln No. 2, and Kiln No. 4. Kiln No. 3 was shut down in 2002. The drying kilns use steam from the boiler to dry the lumber. Each drying kiln has several vents on the roof. The exhaust streams primarily contain PM and volatile organic compounds (VOCs).

Operating Requirements

4.2 Throughput Limits

4.2.1 The permittee shall limit the maximum dimensional lumber throughput to the kilns to less than the amounts listed below:

- Kiln No. 0: 27.3 million board feet (MMbf) per consecutive 12-month period.
- Kiln No. 1: 13.6 MMbf per consecutive 12-month period.
- Kiln No. 2: 13.6 MMbf per consecutive 12-month period.
- Kiln No. 4: 27.3 MMbf per consecutive 12-month period.

4.2.2 The permittee shall not operate Kiln No. 3 during this permit term..

Monitoring and Recordkeeping Requirements

4.3 Throughput Monitoring

The permittee shall monitor and record the monthly and annual amount of lumber dried in Kiln Nos. 0, 1, 2, and 4. The throughput amounts shall be recorded as MMbf per month and the annual amounts shall be based on a rolling 12-month summation.

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5. CYCLONES

5.1 Process Description

Cyclones are used at various locations throughout the facility to collect wood by-products that are being pneumatically transported. There are four cyclones at the facility: a sawdust cyclone, a chip cyclone, and two shavings cyclones.

Emissions Limits

5.2 Emissions Limits

The permittee shall not discharge to the atmosphere from the sawdust cyclone, chip cyclone, or the two shavings cyclones PM₁₀ in amounts exceeding the emissions rate limits listed in Appendix A.

Operating Requirements

5.3 Cyclone Hours of Operation Limits

The permittee shall operate the sawdust cyclone no more than 13 hours in any calendar day.

The permittee shall operate the chip cyclone no more than 13 hours in any calendar day.

The permittee shall operate the planer shavings cyclone no more than 3 hours in any calendar day.

The permittee shall operate the shavings cyclone no more than 3 hours in any calendar day.

Monitoring and Recordkeeping Requirements

5.4 Cyclone Operation and Maintenance Manual

Within 60 days of permit issuance, the permittee shall develop and maintain an Operations and Maintenance (O&M) manual that describes the operation, maintenance and inspection frequency of all cyclones at the facility.

5.5 Monitor Cyclone Hours of Operation

The permittee shall monitor and record the daily operational time of each cyclone at the facility.

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6. FIRE WATER-PUMP ENGINE AND EMERGENCY STANDBY GENERATOR

6.1 Process Description

The facility operates a diesel-fired internal combustion engine to provide power to an fire emergency water pump. The facility includes a diesel-fired emergency generator. The primary purpose of the emergency generator is to supply electrical power during power outages. Routine operation of the facility includes periodic testing of the both diesel-fired internal combustion engines.

Operating Requirements

6.2 Hours of Operation Limits

The permittee shall not operate the emergency water-pump engine for periods exceeding 500 hours per any consecutive 12-month period.

The permittee shall not operate the emergency generator for periods exceeding 500 hours per any consecutive 12-month period.

Monitoring and Recordkeeping Requirements

6.3 Monitor Operating Parameters

The permittee shall monitor the operating time of the emergency water-pump engine and the emergency generator when each is in operation. Records shall also provide monthly hours of operation totals for each unit.

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7. APPENDIX A – SUMMARY OF EMISSIONS RATE LIMITS

The allowable emissions table includes the emissions limits for which the facility must demonstrate compliance.

Table 7.1 SUMMARY OF ALL EMISSION RATE LIMITS IN THE TIER II PERMIT

Bennett Forest Industries, Inc., Elk City Emissions Limits^a			
Source Description	Hourly PM₁₀ Emissions (lb/hour)	Annual PM₁₀ Emissions (T/yr)	CO (T/yr)
Stirling hog fuel boilers (B1)	23	86.3	98.8
Debarker (P1)	0.15	0.041	Not applicable
Hog (P2)	0.081	0.11	Not applicable
Sawdust cyclone (P11)	0.039	0.10	Not applicable
Chipper (P12)	0.10	0.14	Not applicable
Chip cyclone (P13)	2.4	6.1	Not applicable
Planer shavings cyclone (P15)	0.039	0.076	Not applicable
Truck bin shavings cyclone (P16)	0.039	0.076	Not applicable
TOTAL	Not applicable	98.2	99.3

^a As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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8. APPENDIX B – FACILITY-WIDE EMISSIONS INVENTORY

The emissions inventory table includes all potential emissions from all sources at the facility. The emissions inventory table is provided for informational purposes only.

Table 11.1 EMISSIONS INVENTORY BASED ON PTE

Potential Emissions ^a – Hourly (lb/hr), and Annual ^b (T/yr)												
Source Description	PM		PM ₁₀		NO _x		CO		VOC		SO ₂	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler	31	94.5	23	84.7	12	36.0	33	98.3	2.1	6.22	1.4	4.1
Debarker (P1)	0.32	0.089	0.15	0.041	0	0	0	0	0	0	0	0
Hog (P2)	0.18	0.24	0.081	0.11	0	0	0	0	0	0	0	0
Kiln No. 0 (P4)	1.2	4.5	0.595	2.17	0	0	0	0	5.61	20.5	0	0
Kiln No. 1 (P5)	0.61	2.2	0.30	1.08	0	0	0	0	2.79	10.2	0	0
Kiln No. 2 (P6)	0.61	2.2	0.30	1.08	0	0	0	0	2.79	10.2	0	0
Kiln No. 4 (P8)	1.2	4.5	0.595	2.17	0	0	0	0	5.61	20.5	0	0
Fuel bin sawdust cyclone (P11)	0.08	0.2	0.039	0.10	0	0	0	0	0	0	0	0
Chipper (P12)	0.23	0.31	0.10	0.14	0	0	0	0	0	0	0	0
Chip cyclone (P13)	5	12	2.4	6.1	0	0	0	0	0	0	0	0
Planer shavings cyclone (P15)	0.2	0.1	0.17	0.076		0	0	0	0	0	0	0
Truck bin shavings cyclone (P16)	0.2	0.1	0.17	0.076	0	0	0	0	0	0	0	0
Fire pump engine	0.176	0.044	0.176	0.044	2.5	0.62	0.534	0.134	0.201	0.050	0.164	0.041
Emergency generator	1.17	0.294	1.17	0.294	17	4.14	3.57	0.892	1.34	0.335	1.09	0.274
Facility-Wide Potential Emissions	–	121	–	98.2	–	40.8	–	99.3	–	68.0	–	4.4

^a As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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

AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-9512-147-1

Permittee: Bennett Forrest Industries	AIRS Facility No. 049-00001	Date Issued: July 28, 2003
Location: Elk City, Idaho		Date Expires: July 28, 2008

9. TIER II PERMIT GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission 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.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
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.