



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
Curt Fransen, Director

March 25, 2015

Pat Malloy, President of Operations
Idaho Veneer Company
P.O. Box 339
Post Falls, Idaho 83877

RE: Facility ID No. 055-00004, Idaho Veneer Company, Post Falls
Final Permit Letter

Dear Mr. Malloy:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2013.0064 Project 61310 to Idaho Veneer Company located at Post Falls for the reducing wood-waste combustion and increasing natural gas combustion. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received December 22, 2013 and supplemental information provided on May 27, 2014.

This permit is effective immediately and replaces T2 No. 2008.0115, issued on December 23, 2008 and modified on August 22, 2013. This permit does not release Idaho Veneer Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, 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 that 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 contact Robert Baldwin at (208) 373-0502 or robert.baldwin@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\reb

Permit No. P-2013.0064 PROJ 61310

Enclosures

AIR QUALITY

PERMIT TO CONSTRUCT

Permittee Idaho Veneer Company
Permit Number P-2013.0064
Project ID 61310
Facility ID 055-00004
Facility Location 704 E. 4th St.
Post Falls, ID

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued March 25, 2015



Robert Baldwin, Permit Writer



Mike Simon, Stationary Source Manager

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1. Permit Scope

Purpose

- 1.1 This is a modified permit to construct (PTC) for a veneer and dimensional lumber manufacturing facility.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit No. T2-2008.0115, issued on December 23, 2008, and modified on August 22, 2013.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1. Regulated sources.

Permit Section	Source	Control Equipment
3	<u>Wellons Boiler</u> Manufacturer: Wellons Rated capacity: 40,000 lbs of steam/hr Installed: 1976 Burner type: Fuel cell Fuels: wood fired	<u>Multiclone</u>
3	<u>Cleaver Brooks Boiler</u> Manufacturer: Cleaver Brooks Rated capacity: 16.7 MMBtu/hr Production capacity: 13,333 lbs steam /hr Installed: 1971 Fuels: Natural gas	None
3	<u>Thermopack Boiler</u> Manufacturer: Thermopack Rated heat capacity: 600,000 Btu/hr Installed: 1980 Fuels: Natural gas	None
4	<u>Wellons Dry Kiln No. 1 and Coe Dry Kiln No. 2</u> Size rated: 1370 bdf/hr each	None
4	<u>Cremona Dryer</u> Rating: 10,000 sqft/hr (3/8" veneer) Steam Chambers (6)	None
5	<u>Cyclones</u> Hog Fuel Cyclone (P21) Planer Cyclone No.1 and No. 2 (P-38 and P-55) Sawdust Cyclone (P-39) Jointer Cyclone (P-13) Resaw Cyclone (P-14) Hog Overs Cyclone (P-16) Sawmill Chipper Cyclone (P-17) Veneer Chipper Cyclone (P-54)	None

2. Facility-Wide Conditions

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration 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 a quarterly facility-wide inspection of potential sources of fugitive emissions, 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 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.

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.
- 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, at a minimum, include 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.

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, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either
- a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).
 - or
 - b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Open Burning

- 2.9 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning, IDAPA 58.01.01.600-623.

Reports and Certifications

- 2.10 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, 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
Coeur d' Alene Regional Office
2110 Ironwood Parkway
Coeur d' Alene, ID 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

Obligation to Comply

- 2.11 Receiving a Permit to Construct shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

Fuel-burning Equipment

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

3. Boilers

3.1 Process Description

The primary purpose of the Wellons boiler and the two natural gas boilers is to generate steam for the steam chambers, dryers, and dry kilns.

3.2 Emission Control Description

The PM₁₀ emissions from the Wellons boiler are controlled by the multiclone.

Table 3.1 BOILER DESCRIPTIONS

Emissions Unit / Process	Emissions Control Device	Emissions Point
Wellons Boiler	Multiclone	B1
Cleaver Brooks and Thermopack Boilers	None	B2 & B3

Emission Limits

3.3 Emission Limits

The PM, PM₁₀, SO₂, NO_x, CO, and VOC emissions from the boiler's stacks shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 BOILERS EMISSIONS LIMITS

Source Description	PM		PM ₁₀		PM _{2.5}		SO ₂		NO _x		VOC		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Wellons boiler ^a	13.8	32.2	6.9	16.1	4.1	11.49	0.54	1.26	4.74	11.1	0.37	0.85	12.94	30.2
48 MM cubic feet of natural gas combusted annually by Cleaver Brooks and Thermopack boilers combined	0.11	0.18	0.11	0.18	0.11	0.18	0.01	0.01	1.4	2.4	0.07	0.13	1.18	2.02

^a Wellons boiler combust 10,000 green tons per year of wood waste and bark.

^b Cleaver Brooks and Thermopack boilers combust 48 MM cubic feet of natural gas annually

^c In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.

[March 13, 2015]

Operating Requirements

3.4 Fuel Throughput Limits

- Maximum fuel consumption for the Wellons boiler shall not exceed 10,000 green tons in any consecutive 12-month period.
- Maximum fuel consumption for the combined gas-fired boilers shall not exceed 48 million cubic feet of natural gas or propane combined in any consecutive 12-month period.

[March 13, 2015]

3.5 Fuel Specification

- The Wellons boiler shall combust only wood waste and bark.
- The Cleaver Brooks and Thermopack boilers shall only combust natural gas or propane.

3.6 Steam Production

- Maximum steam production shall not exceed 27,902 lb/hr. Maximum steam production shall not exceed 120% of the steam rate attained during a DEQ approved performance test. Last source test on the Wellons boiler was September 27, 2012 with production of 23,252lb steam per hour. The steam production limit may be increased if subsequent performance testing is conducted and compliance with the permit limitations is demonstrated. The hourly average shall be based upon any consecutive 24-hour average.

[March 13, 2015]

NESHAP Subpart JJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial Commercial, and Institutional Boilers Area Sources

§63.11196 What are my compliance dates?

- 3.7 In accordance with 40 CFR 63.11196 (a)(1), if the existing affected boiler is subject to a work practice or management practice standard of a tune-up, you must achieve compliance with the work practice or management practice standard no later than March 21, 2014.
- 3.8 In accordance with 40 CFR 63.11196 (a)(3) if the existing affected boiler is subject to the energy assessment requirement, you must achieve compliance with the energy assessment requirement no later than March 21, 2014.

Emission Limits, Work Practice Standards, Emission Reduction Measures, And Management Practices

- 3.9 In accordance with 40 CFR 63.11201(b), you must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 to this subpart satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement.
- 3.10 In accordance with 40 CFR 63.11201(d), these standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time you must comply only with Table 2 to this subpart.

§63.11205 What are my general requirements for complying with this subpart?

- 3.11 In accordance with 40 CFR 63.11205(a), at all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

§63.11210 What are my initial compliance requirements and by what date must I conduct them?

3.12 In accordance with 40 CFR 63.11210(a), for existing affected boilers that have applicable work practice standards, management practices, or emission reduction measures, you must demonstrate initial compliance no later than the compliance date that is specified in §63.11196 and according to the applicable provisions in §63.7(a)(2), except as provided in paragraph (j) of this section.

(i) For boilers located at existing major sources of HAP that limit their potential to emit (e.g., make a physical change or take a permit limit) such that the existing major source becomes an area source, you must comply with the applicable provisions as specified in paragraphs (i)(1) through (3) of this section.

3.13 In accordance with 40 CFR 63.11210(a)(1), any such existing boiler at the existing source must demonstrate compliance with subpart JJJJJ within 180 days of the later of March 21, 2014 or upon the existing major source commencing operation as an area source.

3.14 In accordance with 40 CFR 63.11210(a)(2), any new or reconstructed boiler at the existing source must demonstrate compliance with subpart JJJJJ within 180 days of the later of March 21, 2011 or startup.

3.15 In accordance with 40 CFR 63.11210(a)(3), notification of such changes must be submitted according to §63.11225(g).

§63.11214 How do I demonstrate Initial compliance with the work practice standard, emission reduction measures, and management practice?

3.16 In accordance with 40 CFR 63.11214(b), if you own or operate an existing or new biomass-fired boiler or an existing or new oil-fired boiler, you must conduct a performance tune-up according to §63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

§63.11223 How do I demonstrate continuous compliance with the work practice and management practice standards?

3.17 In accordance with 40 CFR 63.11223(a), for affected sources subject to the work practice standard or the management practices of a tune-up, you must conduct a performance tune-up according to paragraph (b) of this section and keep records as required in §63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.

3.18 In accordance with 40 CFR 63.11223(b), except as specified in paragraphs (c) through (f) of this section, you must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (b)(1) through (7) of this section. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler.

(1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to

exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.

- (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with *the* manufacturer's specifications, if available.
- (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.
- (4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- (5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- (6) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (b)(6)(i) through (iii) of this section.
 - (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
 - (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
 - (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- (7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

Monitoring and Recordkeeping Requirements

3.19 Fuel Throughput Monitoring Requirement

The permittee shall monitor and record the amount of gas, wood waste and bark combusted to demonstrate compliance with Permit Condition 3.5. The annual amount shall be determined by combining the 12 most recent consecutive monthly amounts. The method for monitoring the wood waste combusted shall be approved by DEQ.

3.20 PM and PM10 Performance Test

The permittee shall conduct a performance test to measure the opacity and the PM₁₀ emissions from the Wellons boiler no later than September 27, 2017. At least once every five years thereafter, the permittee shall conduct a performance test to measure opacity and the PM₁₀ emissions from the Wellons boiler stack. The test shall be conducted to demonstrate compliance with the emission rate limits specified in Permit Conditions 3.3 and 3.4. Each performance test conducted to demonstrate compliance shall be in accordance with IDAPA 58.01.01.157. Compliance with the hourly emissions limit shall be determined by the average hourly PM₁₀ emissions rate measured during the performance test.

The following conditions shall apply during the performance testing:

- The amount of wood fuel burned by the boiler shall be monitored and recorded during the test.
- Steam production of the boiler shall be monitored and recorded during the test.

All performance testing shall be conducted in accordance with General Provision 6.7 thru 6.9.

3.21 Wellons Boiler Steam Production Monitor

The permittee shall have installed, calibrated, maintained, and operated, in accordance with manufacturer specifications, a device which continuously monitors steam production rate of the Wellons boiler.

3.22 Multiclone Operation and Maintenance Manual

The permittee shall have developed and maintained on-site an Operation and Maintenance (O&M) manual for the Wellons boiler multiclone describing the schedule and steps taken to assure the air pollution control equipment will be properly operated and maintained. The O&M manual shall address the operation, maintenance, inspection frequency, and repair of the multiclone.

§63.11225 What are my notification, reporting, and recordkeeping requirements?

3.23 In accordance with 40 CFR 63.11225(a), you must submit the notifications specified in paragraphs (a)(1) through (5) of this section to the administrator.

- (1) You must submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to you by the dates specified in those sections except as specified in paragraphs (a)(2) and (4) of this section.
- (2) An Initial Notification must be submitted no later than January 20, 2014 or within 120 days after the source becomes subject to the standard.
- (3) If you are required to conduct a performance stack test you must submit a Notification of Intent to conduct a performance test at least 60 days before the performance stack test is scheduled to begin.
- (4) You must submit the Notification of Compliance Status no later than 120 days after the applicable compliance date specified in §63.11196 unless you must conduct a performance stack test. If you must conduct a performance stack test, you must submit the Notification of Compliance Status within 60 days of completing the performance stack test. You must submit

the Notification of Compliance Status in accordance with paragraphs (a)(4)(i) and (vi) of this section. The Notification of Compliance Status must include the information and certification(s) of compliance in paragraphs (a)(4)(i) through (v) of this section, as applicable, and signed by a responsible official.

3.24 In accordance with 40 CFR 63.11225(b) ,you must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (b)(1) through (4) of this section. You must submit the report by March 15 if you had any instance described by paragraph (b)(3) of this section. For boilers that are subject only to a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, you may prepare only a biennial or 5-year compliance report as specified in paragraphs (b)(1) and (2) of this section.

(1) Company name and address.

(2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

(i) "This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."

3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.

3.25 In accordance with 40 CFR 63.11225(c), you must maintain the records specified in paragraphs (c)(1) through (5) of this section.

(1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

(2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this section.

(i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturers specifications to which the boiler was tuned.

(iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.

(4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance

with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

- 3.26 In accordance with 40 CFR 63.11225(d), your records must be in a form suitable and readily available for expeditious review. You must keep each record for 5 years following the date of each recorded action. You must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. You may keep the records off site for the remaining 3 years.
- 3.27 In accordance with 40 CFR 63.11225(g), if you have switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within subpart JJJJJ, in the boiler becoming subject to subpart JJJJJ, or in the boiler switching out of subpart JJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to subpart JJJJJ, you must provide notice of the date upon which you switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:
- (1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.
 - (2) The date upon which the fuel switch, physical change, or permit limit occurred.

§63.11226 Affirmative defense for violation of emission standards during malfunction.

- 3.28 In accordance with 40 CFR 63.11226, in response to an action to enforce the standards set forth in §63.11201 you may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction, as defined at 40 CFR 63.2. Appropriate penalties may be assessed if you fail to meet your burden of proving all of the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief.

[40 CFR 63.11226]

- 3.29 In accordance with 40 CFR 63.11226 (a) to establish the affirmative defense in any action to enforce such a standard, you must timely meet the reporting requirements in paragraph (b) of this section, and must prove by a preponderance of evidence that:
- (1) The violation: Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and
 - (ii) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and
 - (iii) Was not part of a recurring pattern indicative of inadequate design, operation, or maintenance;and
 - (2) Repairs were made as expeditiously as possible when a violation occurred; and
 - (3) The frequency, amount, and duration of the violation (including any bypass) were minimized

to the maximum extent practicable; and

- (4) If the violation resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and
- (5) All possible steps were taken to minimize the impact of the violation on ambient air quality, the environment, and human health; and
- (6) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and
- (7) All of the actions in response to the violation were documented by properly signed, contemporaneous operating logs; and
- (8) At all times, the affected source was operated in a manner consistent with good practices for minimizing emissions; and
- (9) A written root cause analysis has been prepared, the purpose of which is to determine, correct, and eliminate the primary causes of the malfunction and the violation resulting from the malfunction event at issue. The analysis shall also specify, using best monitoring methods and engineering judgment, the amount of any emissions that were the result of the malfunction.

[40 CFR 63.11226(a), (a)(1-9)]

- 3.30 In accordance with 40 CFR 63.11226 (b) the owner or operator seeking to assert an affirmative defense shall submit a written report to the Administrator with all necessary supporting documentation, that it has met the requirements set forth in paragraph (a) of this section. This affirmative defense report shall be included in the first periodic compliance, deviation report or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance, deviation report or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance, deviation report or excess emission report due after the initial occurrence of the violation of the relevant standard.

[40 CFR 63.11226 (b)]

AIR QUALITY

PERMIT TO CONSTRUCT

4. Dry Kilns And Veneer Dryers

4.1 Process Description

There are two lumber dry kilns, one veneer dryer, and six steam chambers permitted for operation at this facility.

4.2 Emission Control Description

The PM₁₀ emissions from the kilns, dryer and steam chambers are uncontrolled.

Table 4.1 KILNS, DRYER, AND STEAM CHAMBERS

Emissions Unit / Process	Emissions Control Device	Emissions Point
Dry kilns	None	P-10 & P-11
Veneer dryer	None	P-1
Steam chambers	None	Not numbered

Emission Limits

4.3 Emission Limits

The PM₁₀ and VOC emissions from the dry kilns, steam chambers and veneer dryers stacks shall not exceed any corresponding emissions rate limits listed in Table 3. 4.2.

Table 4.2 KILNS, DRYER, AND STEAM CHAMBERS EMISSIONS LIMITS

Source Description	PM ₁₀	VOC
	T/yr	T/yr
Combined emissions from kilns, dryers, and steam chambers	8.61	14.11

In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.

Operating Requirements

4.4 Maximum Sawmill Lumber Throughput

The maximum dimensional lumber throughput to the dry kilns shall not exceed 35 million board feet per year lumber scale (MMbf/yr), based on the most recent consecutive 12-month period.

4.5 Veneer Dryer Throughput

The maximum veneer dryer throughput shall not exceed 10.5 million square feet (MMsf) of veneer per year at its equivalent 3/8" thickness, based on the most recent consecutive 12-month period.

4.6 Maximum Facility Log Throughput

The maximum facility throughput of logs shall not exceed 23 million board feet log scale (MMbdft/yr), based on the most recent consecutive 12-month period.

Monitoring and Recordkeeping Requirements

4.7 Facility-wide Log Throughput Monitoring Requirement

The permittee shall monitor and record, on a monthly and annual basis, the throughput of logs to the facility. The amounts shall be recorded as million board feet per year based on log scale, to demonstrate compliance with Permit Condition 4.6. The annual amount of board feet shall be based on the most recent consecutive 12-month period.

4.8 Veneer Throughput

The permittee shall monitor and record the monthly and annual veneer production. The amounts shall be recorded as million square feet per year (MMSf of veneer/yr) to demonstrate compliance with Permit Condition 4.5. The calculations used to determine the throughput shall be based on its equivalent 3/8" thickness. The annual amount shall be based on the summation of throughput for the most recent consecutive 12-month period.

4.7 Lumber Throughput Monitoring Requirement

The permittee shall monitor and record, on a monthly and annual basis, the throughput of lumber through the dry kilns. The amounts shall be recorded as million board feet per year based on lumber scale, to demonstrate compliance with Permit Condition 4.4. The annual amount of board feet shall be based on the most recent consecutive 12-month period.

5. Cyclones

5.1 Process Description

These emission units consist of cyclones controlling woodworking equipment throughout the facility and the transport of hog fuel, bark, and sawdust to the Wellons boiler.

5.2 Emission Control Description

All the cyclones' emissions are uncontrolled and are emitted from the points indicated in the following table.

Table 5.1 CYCLONE DESCRIPTIONS

Emissions Unit / Process	Emissions Control Device	Emissions Point
Hog Fuel Cyclone	NONE	P-21
Planer Cyclone No. 1 and No. 2		P-38 & P-55
Sawdust Cyclone		P-39
Jointer Cyclone		P-13
Resaw Cyclone		P-14
Hog Overs Cyclone		P-16
Sawmill Chipper Cyclone		P-17
Veneer Chipper Cyclone		P-54

Emission Limits

5.3 Emission Limits

The combined emissions from the cyclones shall not exceed the emission rate limits listed in Table 5.2.

Table 5.2 COMBINED CYCLONE EMISSIONS LIMITS

Source Description	PM ₁₀
	T/yr
Combined emissions from cyclones	1.7

In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.

Operating Requirements

5.4 Cyclone Operation and Maintenance

The permittee shall have developed, and maintained an Operation and Maintenance (O&M) manual for all facility cyclones which describes the schedule and steps taken to assure the cyclone equipment will be properly operated and maintained. The O&M manual shall address the operation, maintenance, inspection frequency and repair of the cyclones.

Monitoring and Recordkeeping Requirements

5.5 Opacity Monitoring Requirement

The permittee shall monitor and record on a quarterly basis the opacity for the exhaust of the cyclones to demonstrate compliance with Permit Condition 2.7, 2.8 and General Provision 7.

5.6 Throughput Monitoring

Monitoring the lumber, log, veneer and hog fuel throughputs shall demonstrate compliance with Permit Condition 5.3.

6. General Provisions

General Compliance

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

[Idaho Code §39-101, et seq.]

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

[IDAPA 58.01.01.211, 5/1/94]

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

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

6.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

6.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

6.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then

notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

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

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 6.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 6.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 6.9 Within 60 days, following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 6.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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 58.01.01.211, 5/1/94]

Excess Emissions

6.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

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

[IDAPA 58.01.01.123, 5/1/94]

False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

Transferability

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

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

6.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]