



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
John H. Tippets, Director

March 2, 2016

Bob Shaw, General Manager
Woodgrain Millwork - Emmett
P.O. Box 757
Emmett, ID 83617

RE: Facility ID No. 045-00006, Woodgrain Millwork - Emmett
Transfer of Ownership by Permit to Construct Operating Permit Revision

Dear Mr. Shaw:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) P-2010.0016, Project No. 61661, to Woodgrain Millwork - Emmett for a transfer of ownership. This PTC is issued in accordance with IDAPA 58.01.01.209.04 of the Rules for the Control of Air Pollution in Idaho and is based on the certified information received on February 16, 2016. The transfer of ownership is based on the following information:

Previous Permittee Information

Permittee:	Gem Forest Products
Mailing Address:	P. O. Box 455, Emmett, ID 83617
Facility Location:	500 West Main, Emmett, ID 83617
Facility Contact:	Diane Lorenzen, Facility Permitting Contact
Phone Number:	(406) 549-3995
E-mail Address:	dianelorenzen@charter.net
Responsible Official:	Tim Denton, Owner
Phone Number:	(208) 691-4207

Updated Permittee Information

Permittee:	Woodgrain Millwork - Emmett
Mailing Address:	P. O. Box 757, Emmett, ID 83617
Facility Location:	500 West Main, Emmett, ID 83617
Facility Contact:	Ryan Skinner, Facility Permitting Contact
Phone Number:	(208) 703-7003
E-mail Address:	rskinner@woodgrain.com
Responsible Official:	Bob K. Shaw, General Manager
Phone Number:	(208) 608-0837

This permit is effective immediately and replaces PTC No. 2010.0016 issued August 28, 2014. This permit does not release Woodgrain Millwork - Emmett 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 Tom Krinke, AQ Compliance Officer, at (208)373-0419 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends 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.

If you have any questions, please contact Tom Burnham at 208.373.0502 or tom.burnham@deq.idaho.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Mike Simon
Stationary Source Program Manager
Air Quality Division

Attachment

MS/tb

Permit No. P-2010.0006 PROJ 61661

Air Quality

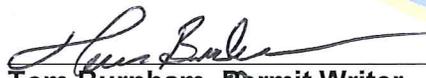
PERMIT TO CONSTRUCT

Permittee Woodgrain Millwork - Emmett
Permit Number P-2010.0016
Project ID 61661
Facility ID 045-00006
Facility Location 500 West Main
Emmett, ID 83617

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 2, 2016


Tom Burnham, Permit Writer


Mike Simon, Stationary Source Manager

Contents

1	Permit Scope.....	3
2	Wellons Woodwaste-Fired Stoker Boiler.....	4
3	Drying Kilns	9
4	Planer Mill	12
5	Emergency Fire Pump Generator	14
6	Fugitive Dust Sources.....	18
7	Facility-Wide Hazardous Air Pollutant Emissions.....	20
8	General Provisions.....	22

1 Permit Scope

Purpose

1.1 This is a revised permit to construct to change the facility name from Gem Forest Products, Inc. to Woodgrain Millwork - Emmett. Ownership was also transferred from Tim Denton to Bob K. Shaw.

[3/2/2016]

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 to Construct No. P- 2010.0016, issued on August 28, 2014.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	<u>Wellons woodwaste-fired stoker boiler</u> Manufacturer: Wellons Year manufactured: 1994 Type: Spreader stoker Rated heat input capacity: 28.87 MMBtu/hr Rated steam rate: 25,000 pounds per hour Maximum hourly woodwaste input rate: 1.68 tons Maximum annual woodwaste input rate: 14,673 tons Fuel value: 8,613 Btu per dry pound	<u>Wellons boiler emission control equipment</u> <u>Electrostatic precipitator (ESP)</u> Manufacturer: Wellons Model No.: Wellons Type: Dry Number of T/R sets: two Air flow rate: 17,600 acfm at 350°F Particulate matter removal efficiency: 80%
3	<u>Diesel-fired generator- Emergency fire pump</u> Manufacturer: John Deere Year manufactured: 1994 Rated capacity: 140 bhp (104 kW); Ignition type: compression Maximum fuel consumption: 7.79 gal/hr Maintenance and testing hours of operation: 100 hr/yr	Emissions from the fire pump are uncontrolled
4	<u>Dry kilns (2)</u> Manufacturer: Wellons Two identical double-track kilns with computerize controls. Each kiln has 20 vents	PM and VOC emissions from the dry kilns are uncontrolled.
5	<u>Planer mill, sawmill dust, and chip bins</u> Sawdust generated from the sawmill will be pneumatically conveyed to the sawdust bin. A chipper is fully enclosed within the sawmill. The woodwaste generated by the chipper is chain driven to the chip bin. The sawdust and wood chips are periodically unloaded via a truck through a partially enclosed flap.	PM ₁₀ emissions from the planer mill and the chip bins are controlled by a cyclone and a baghouse. Baghouse PM ₁₀ efficiency is 99%
6	<u>Fugitive dust sources</u> These include the debarker, sawmill, hog, screens, boiler fuel transfer points, woodwaste storage pile, trucks driving on paved and unpaved roads, woodwaste truck unloading, ash handling, etc.	Reasonable control of fugitive dust

2 Wellons Woodwaste-Fired Stoker Boiler

2.1 Process Description

The Wellons boiler has a heat input capacity of 28.87 MMBtu/hr will be fired by woodwaste fuel to produce steam for indirect heating of the dry kilns. The boiler is rated at 25,000 lb/hr of steam production. Two fuel boxes connected to the boiler are used to store and feed the woodwaste fuel to the boiler. Each fuel box is enclosed by three sides. A transfer point is used to unload the woodwaste into the boxes.

The boiler is subject to the federal NSPS, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

[12/30/2010]

2.2 Control Device Descriptions

Table 2.1 Wellons Woodwaste-fired Stoker Boiler Description

Emissions Units / Processes	Control Devices	Emission Points
Woodwaste-fired stoker boiler	ESP	Boiler Stack

[12/30/2010]

Emission Limits

2.3 Emission Limits

Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometer (PM₁₀) including condensable particulate as defined in IDAPA 58.01.01.006.82 emissions from the Wellons stoker boiler stack shall not exceed 0.37 pounds per hour and 1.62 tons per consecutive 12-calendar month period.

In absence of any other creditable evidence, compliance with emission limits is assured by complying with this permit's operating, monitoring and recordkeeping requirements.

[12/30/2010]

2.4 Fuel-Burning Equipment

The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.080 grain per dry standard cubic foot (gr/dscf) of effluent gas corrected to 8% oxygen by volume for wood products, in accordance with IDAPA 58.01.01.676.

[12/30/2010]

2.5 Visible Emissions Limit

The permittee shall not discharge any air pollutant into 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 required by IDAPA 58.01.01.625. Opacity shall be determined by the 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 failure of the emission to comply with the requirements of this section.

[12/30/2010]

Operating Requirements

2.6 Fuel Types

- The boiler shall be fired exclusively with wood products.
- Only natural gas fuel shall be used during the start-up of the boiler.

[12/30/2010]

2.7 Steam Production Limits

The amount of steam produced by the Wellons stoker boiler shall not exceed 24,900 pounds of steam per hour averaged over any consecutive 24-hour period.

[12/30/2010]

2.8 Steam Production Measuring Device

The permittee shall install, maintain, calibrate, and operate, in accordance with manufacturer specifications, equipment to continuously measure the steam production rate of the Wellons stoker boiler.

[12/30/2010]

2.9 ESP Control Device

- The permittee shall install and operate an ESP to control PM, PM₁₀, and opacity emissions from the boiler.
- The secondary voltage and amperage applied to each transformer-rectifier set, and the spark rate of the ESP shall be maintained within manufacturer specifications. Documentation of the manufacturer specifications shall remain on site at all times and shall be made available to DEQ representatives upon request. In addition to the manufacturer specifications, the permittee shall prepare a summary sheet of the manufacturer operating parameter specifications for the following:
 - Secondary amperage including the averaging time (continuous measured).
 - Secondary voltage including the averaging time (continuous measured).
 - Spark Rate operating range including the averaging time (continuous measured).

As an alternative to the manufacture operating parameters, the permittee may establish new operating parameters by conducting a performance test that demonstrates compliance with the PM₁₀ pound per hour/and or grain loading standard for the boiler stack while operating at the alternative operating parameters. The performance test shall be conducted in accordance with the Test Methods and Procedures specified in the Rules (IDAPA 58.01.01.157) and in accordance with a DEQ-approved source test protocol. All operating parameters specified in this permit condition shall be continuously monitored and recorded during each test run. The permittee may request to operate outside of the sparking rate range, and below the minimum values for voltage and amperage specified by the manufacturer during the performance test by submitting a written source test protocol to DEQ for approval and requesting to operate under alternative operating parameters during the duration of the test. Once the source test is completed, the permittee may request in writing to operate in accordance with alternative operating parameters. The request shall include a source test report and justification for the alternative operating parameters. Upon receiving DEQ written approval of the source test and the requested alternative operating parameters, the permittee shall operate in accordance with those DEQ-approved alternative operating parameters. A copy of DEQ's approval shall be maintained on site with a copy of this permit.

[12/30/2010]

Monitoring and Recordkeeping Requirements

2.10 Visible Emissions Monitoring

The permittee shall conduct a monthly inspection of visible emissions from the Wellons ESP stack during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation of visible emissions. If any visible emissions are present from the ESP stack, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the 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.

[12/30/2010]

2.11 ESP Operating Parameter Monitoring Requirements

The permittee shall install, calibrate, operate and maintain any equipment necessary to monitor continuously the following:

- Secondary current
- Secondary amperage
- Sparking rate

The monitoring equipment shall be operated in accordance with manufacturer specifications. The monitoring equipment shall record on date stamped strip charts, circular charts, or electronic data logs in units of measure consistent with the specified operating parameters and averaging times.

[12/30/2010]

2.12 ESP Annual Inspection and Recording

- At least once each calendar year, the permittee shall inspect the ESP for physical degradation that could affect the performance of the ESP. At a minimum, the permittee shall check the following components of the ESP for damage or other condition that would reduce the efficiency:
 - Discharge electrodes
 - Collection electrodes
 - Electrode alignment
 - Rapper mechanisms for the electrodes
 - Transformer-rectifier sets
- The permittee shall record in a log (an electronic log is acceptable) the results of the inspection. The log shall contain the date of inspection, the identity of the inspector, the results of each inspection, and the date of any repairs made or corrective action taken.

[12/30/2010]

2.13 Steam Production Monitoring

The permittee shall monitor and record the pounds of steam produced for each calendar hour to demonstrate compliance with the Wellons boiler steam production limits. The steam production rate shall be recorded as pounds per hour. The steam production rate records for the Wellons boiler shall be maintained at the facility in accordance with the Monitoring and Recordkeeping of the General Provisions of this permit.

[12/30/2010]

2.14 PM and PM₁₀ Performance Tests

Within 180 days of startup of the boiler, the permittee shall conduct performance tests on the Wellons boiler stack to demonstrate compliance with the PM₁₀ and PM emissions limits specified in the Emissions Limits of the Wellons boiler. The PM₁₀ and PM emission rate limits should be in units of lb/hr and in grains/dscf, respectively. The performance tests and the averaging period determined by the source tests methods prescribed by IDAPA 58.01.01.157. The permittee is encouraged to submit a source testing protocol for approval 30 days prior to conducting the performance tests.

The permittee shall test in accordance with IDAPA 58.01.01.157 and the conditions of this permit including the operating requirements for the Wellons boiler and the Performance Testing of the General Provisions. Performance Testing of the General Provisions includes notification requirements, testing procedures and reporting requirements. The permittee shall monitor and record the following during the performance tests;

- Visible emissions, using the methods and procedures contained in IDAPA 58.01.01.625.
- Power input to the ESP (the sum of the secondary voltage times secondary current for the transformer-rectifier (T/R) set, or $P = V_1I_1 + V_2I_2$)
- The ESP sparking rate
- The Wellons boiler steaming rate in pounds of steam/hr.

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

After the startup performance tests, further testing shall be performed according to the following schedule:

Table 2.2 TIERED TEST FREQUENCY

Initial Performance Test Result	Subsequent Testing Frequency
Emissions are more than 90 percent of the most stringent emissions limit.	Next year
Emissions are between 75 and 90 percent of the most stringent emissions limit and/or have low variability.	Within three years
Emissions are less than 75 percent of the most stringent emissions limit and/or have low variability.	Within five years

[12/30/2010]

2.15 NSPS, 40 CFR 60, Subpart Dc - Notification Requirements

- The permittee shall submit to EPA and DEQ a notification of the date of construction or reconstruction and actual startup, as provided by 40 CFR 60.7, in accordance with 40 CFR 60.48c. This notification shall include the design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- All records required under this section shall be maintained by the permittee in accordance with the Monitoring and Recordkeeping requirements of the General Provisions of this permit.
- NSPS 40 CFR 60, Subpart A – General Provisions for Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units)

The permittee must comply with the requirements in General Provisions of 40 CFR 60, Subpart A. Generally applicable reporting, recordkeeping and notification requirements of Subpart A of the New Source Performance Standards (NSPS, 40 CFR 60) are included in Table 8. These summaries are provided to highlight the notification and recordkeeping requirements of 40 CFR 60 for affected facilities, and are not intended to be a comprehensive listing of all general provision requirements that may apply nor do the summaries relieve the permittee from the responsibility to comply with all applicable requirements of the CFR. Should there be a conflict between these summaries and the NSPS, the NSPS shall govern. The permittee is encouraged to read all of 40 CFR 60 Subpart A.

2.16 NSPS, 40 CFR 60, Subpart Dc – Fuel Monitoring Requirements

In accordance with 40 CFR 60.48c (g)(1), except as provided as follows, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42C to use fuel certification to demonstrate compliance with the SO₂ standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard

(excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

[8/28/2014]

Table 2.3 Subpart A to 40 CFR Part 60 Subpart Dc – Summary of Applicable Requirements of NSPS 40 CFR 60 Subpart A- General Provisions

Section	Subject	Summary of Section Requirements
60.4	Address	All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart(s) shall be submitted to: Department of Environmental Quality Boise Regional Office 1445 N. Orchard Boise, ID 83706-2239
60.7(a),(b), and (f)	Notification and Recordkeeping	<ul style="list-style-type: none"> • Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date. • Notification shall be furnished of initial startup postmarked within 15 days of such date. • Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made. • Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative. • Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.
60.12	Circumvention	<ul style="list-style-type: none"> • No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.
60.14	Modification	<ul style="list-style-type: none"> • A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14. • Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.
60.15	Reconstruction	<ul style="list-style-type: none"> • An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.

[40 CFR 60.48c, Subpart A, 12/30/2010]

3 Drying Kilns

3.1 Process Description

- Two identical Wellons double track dry kilns with computerized steam controls are used to dry green lumber. The kilns are indirectly heated by using steam which is supplied by the woodwaste-fired boiler. The steam is supplied to heating coils within the kilns which transfer heat to the stacked lumber to drive off the desired amount of moisture. Fans inside the kilns circulate the heated air inside the kilns, and vents in the roof of each kiln are opened and closed to maintain the desired conditions within the kiln.

[3/8/2010]

3.2 Control Device Descriptions

The emissions from the kilns are uncontrolled. The following table lists the emissions unit(s) and the emissions control device

Table 3.1 Lumber Drying Kilns Description

Emissions Units / Processes	Control Devices
Two Wellons Double-Track Kilns	None

[3/8/2010]

Emission Limits

3.3 Visible Emissions Limits

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

3.4 Kilns temperature Limits

The maximum drying kiln temperature for each kiln shall not exceed 200⁰F during operation.

[12/30/2010]

Operating Requirements

3.5 Throughput Limits

The throughput of lumber for the drying kilns shall not exceed 32 million board feet during any consecutive 12-month period.

[12/30/2010]

3.6 Kilns Temperature Device

The permittee shall install, calibrate, maintain, and operate a device to continuously measure the temperature for each lumber drying kiln.

[12/30/2010]

Monitoring and Recordkeeping Requirements

3.7 Throughput Monitoring

Each month, the permittee shall monitor and record the throughput of lumber for the drying kilns in units of million board feet for that month and for the most recent 12-month period. Annual throughput shall be determined by summing monthly throughput over the previous consecutive 12-month period. The records of throughput of lumber to the kilns shall be maintained at the facility in accordance with the Monitoring and Recordkeeping of the General Provisions of this permit.

[3/8/2010]

3.8 Temperature Monitoring

The permittee shall monitor and record the maximum temperature achieved per drying cycle for each of the lumber drying kilns once per day. The records of temperature of the kilns shall be maintained at the facility in accordance with the Monitoring and Recordkeeping of the General Provisions of this permit.

[12/30/2010]

4 Planer Mill

4.1 Process Description

After drying in the kilns, lumber is planed to final dimensions in the planer mill. The planer mill shavings are pneumatically conveyed to an enclosed shavings bin containing a cyclone and a baghouse system to control particulate emissions. Dry wood shavings are periodically unloaded by truck through a partially enclosed flap.

[12/30/2010]

4.2 Control Device Descriptions

Table 4.1 Stetson Planer Mill Description

Emissions Units / Processes	Control Devices	Emission Points
Planer mill	Cyclone followed by a baghouse	Planer vent

[12/30/2010]

• **Operating Requirements**

4.3 Throughput and Hours of Operation Limits

- The throughput of lumber processed by the planer mill shall not exceed 220,000 board feet per day, as requested by the permittee.
- The throughput of lumber processed by the planer mill shall not exceed 32 million board feet during any consecutive 12-month period.

[12/30/2010]

4.4 Baghouse Operating Requirements

- The permittee shall install and operate a cyclone and a baghouse to control PM₁₀ and PM emissions from the planer mill stack.
- Within 60 days of startup of the planer mill, the permittee shall have developed a baghouse procedures document for the inspection and operation of the baghouse which controls the PM₁₀ and PM emissions from the planer mill 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 to comply with the General Compliance in the PTC General Provisions of this permit and shall contain requirements for quarterly 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 Monitoring and Recordkeeping in the General Provisions of this permit. 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 within 60 days of permit issuance 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.

[12/30/2010]

Monitoring and Recordkeeping Requirements

4.5 Throughput and Hours of Operation Monitoring

- The permittee shall monitor and record the throughput of lumber for the planer mill in units of board feet per day. The records shall be maintained on site in accordance with Monitoring and Recordkeeping of the General Provisions of this permit.
- Each month, the permittee shall monitor and record the throughput of lumber for the planer mill in units of million board feet for that month and for the most recent 12-month period. Annual throughput shall be determined by summing monthly throughput over the previous consecutive 12-month period.

[12/30/2010]

5 Emergency Fire Pump Generator

5.1 Process Description

The engine has a maximum rated capacity of 140 bhp and manufactured by John Deere in 1994, and is fired by diesel fuel. The generator is used as a fire pump and will be used for emergency purposes. The generator is subject to MACT Subpart ZZZZ.

[12/30/2010]

5.2 Emissions Control Description

Emissions from the generator are uncontrolled.

[12/30/2010]

Emission Limits

5.3 Visible Emissions Limits

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

[12/30/2010]

Operating Requirements

5.4 Hours of Operation

The maximum hours of operation for the generator shall not exceed four hours per day that is used for testing and maintenance purposes. The operation hours does not apply during emergency situations.

[12/30/2010]

5.5 Fuel Sulfur Content

In accordance with IDAPA 58.01.01.728, no person shall sell, distribute, use, or make available for use, any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade No. 1 fuel oil - 0.3% by weight
- ASTM Grade No. 2 fuel oil - 0.5% by weight.

[12/30/2010]

Monitoring and Recordkeeping Requirements

5.6 Visible Emissions Monitoring

The permittee shall conduct a quarterly inspection of visible emissions from the generator stack during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation of visible emissions. If any visible emissions are present from the generator stack, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the

exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the 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.

[12/30/2010]

5.7 Hours of Operation Monitoring

The permittee shall monitor and record the hours of operation of the generator when operating for testing and maintenance and testing. The records shall be maintained on site in accordance with Monitoring and Recordkeeping of the General Provisions of this permit.

[12/30/2010]

5.8 Sulfur Content Monitoring

The permittee shall maintain documentation of supplier verification of the sulfur content in the distillate fuel on an as-received basis for every shipment. All data shall be maintained onsite in accordance with Monitoring and Recordkeeping of the General Provisions of this permit.

[12/30/2010]

5.9 National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines – 40 CFR 63 Subpart ZZZZ

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

Subpart ZZZZ applies to the existing stationary Reciprocating Internal Combustion Engine (RICE) located at area source of HAP emissions. Subpart ZZZZ applies to the existing emergency diesel-fired generator fire pump with a rated capacity of 140 brake HP. Within the context of 40 CFR 63 Subpart ZZZZ, the terms "you" and "your" mean "permittee" and "permittee's" respectively. The following shall apply to the generator:

- In accordance with 40 CFR 63.6625, you must operate and maintain the existing stationary RICE in accordance to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extend practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- In accordance with 40 CFR 63.6640(f), you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Paragraphs (f)(1)(i) and (f)(1)(iii) are as follows:
 - a. There is no time limit on the use of emergency stationary RICE in emergency situations
 - b. You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year.
 - c. You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing.

- In accordance with 40 CFR 63.6655(e), you must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following RICE; (1) an existing stationary emergency RICE, (2) an existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.
- In accordance with 40 CFR 63.6655(f), an existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If engines are used for demand response, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.
- In accordance with 40 CFR 63.6603, if you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d. Table 2d lists the following emission and operating limitation requirements that apply to the generator on and after May 3, 2013:
 1. Change oil and oil filter every 500 hours of operation or annually, whichever comes first; and
 2. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and
 3. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary
- In accordance with 40 CFR 63.6640, you must continuously comply with emissions and operating limitations as required by the following in Table 6 to Subpart ZZZZ of Part 63:
 - (i) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.
- MACT 40 CFR 63, Subpart A – General Provisions for Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines)

The permittee must comply with the requirements in General Provisions of 40 CFR 63, Subpart A.

Generally applicable reporting, recordkeeping and notification requirements of Subpart A of the MACT, 40 CFR 63 are included in Table 11. These summaries are provided to highlight the notification and recordkeeping requirements of 40 CFR 63 for affected facilities, and are not intended to be a comprehensive listing of all general provision requirements that may apply nor do the summaries relieve the permittee from the responsibility to comply with all applicable requirements of the CFR. Should there be a conflict between these summaries and the MACT, the MACT shall govern. The permittee is encouraged to read all of 40 CFR 63 Subpart A.

Table 11 Subpart A to 40 CFR Part 63 Subpart ZZZZ – Summary of Applicable Requirements of MACT 40 CFR 63 Subpart A- General Provisions

Citation	Subject	Explanation
40 CFR 63.1(a)(1)-(12)	General Applicability	
40 CFR 63.1(b)(1)-(3)	Initial Applicability Determination	Applicability of subpart ZZZZ is also specified in 40 CFR 63.6585
40 CFR 63.1(c)(1)	Applicability After Standard Established	
40 CFR 63.1(c)(2)	Applicability of Permit Program for Area Sources	
40 CFR 63.1(c)(5)	Notifications	
40 CFR 63.2	Definitions	Additional definitions are specified in 40 CFR 63.6675.
40 CFR 63.3(a)-(c)	Units and Abbreviations	
40 CFR 63.4(a)(1)-(5)	Prohibited Activities	
40 CFR 63.4(b)-(c)	Circumvention/Fragmentation	
40 CFR 63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	
40 CFR 63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	40 CFR 63.6595 specifies the compliance dates.
40 CFR 63.6(c)(1)-(5)	Compliance Dates for Existing Sources	40 CFR 63.6595 specifies the compliance dates.
40 CFR 63.6(f)(2)-(3)	Methods for Determining Compliance	
40 CFR 63.6(g)(1)-(3)	Use of an Alternative Standard	
40 CFR 63.6(i)(1)-(16)	Extension of Compliance	
40 CFR 63.6(j)	Presidential Compliance Exemption	
40 CFR 63.8	Monitoring Requirements	40 CFR 63.6625 specifies appropriate monitoring requirements
40 CFR 63.9(a)-(e), (g)-(j)	Notification Requirements	40 CFR 63.645 specifies notification requirements.
40 CFR 63.10(a)	Recordkeeping/Reporting—Applicability and General Information	
40 CFR 63.10(b)(1)	General Recordkeeping Requirements	Additional requirements are specified in 40 CFR 63.6655
40 CFR 63.10(b)(2)(xii)	Waiver of recordkeeping requirements	
40 CFR 63.10(b)(2)(xiv)	Records supporting notifications	
40 CFR 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	
40 CFR 63.10(d)(1)	General Reporting Requirements	Additional requirements are specified in 40 CFR 63.6650
40 CFR 63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	
40 CFR 63.10(f)	Recordkeeping/Reporting Waiver	
40 CFR 63.12	State Authority and Delegations	
40 CFR 63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Incorporation by Reference	
40 CFR 63.15	Availability of Information/Confidentiality	

[40 CFR 63, Subpart A, 12/30/2010]

6 Fugitive Dust Sources

6.1 Process Description

Fugitive sources at the facility include the following:

- Milling operations - the debarker, sawmill, hog, and screens
- Boiler fuel transfer points
- Woodwaste storage pile transfer, wind erosion
- Trucks driving on paved and unpaved roads
- Woodwaste trucks unloading
- Ash handling.

[3/8/2010]

6.2 Emission Control Description

Emissions from the above sources are controlled in accordance with IDAPA 58.01.01.650 (Rules for Control of Fugitive Dust).

[3/8/2010]

Operating Requirements

6.3 Reasonable Control of Fugitive Dust Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with 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.

[3/8/2010]

Monitoring and Recordkeeping Requirements

6.4 Fugitive Dust Monitoring

The permittee shall monitor and maintain records of the frequency and method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive dust emissions. 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 taken.

6.5 Reasonable Control Measures

The permittee shall conduct a monthly 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.

[3/8/2010]

7 Facility-Wide Hazardous Air Pollutant Emissions

7.1 Process Description

The applicant requested to add synthetic minor hazardous air pollutants (HAP) emissions limits from the facility so that the facility would be defined as a minor source of HAP emissions. Sources of HAP emissions at the facility are the Wellons woodwaste-fired boiler, the two lumber drying kilns, and the diesel emergency fire pump.

[12/30/2010]

7.2 Emissions Control Description

The metallic HAP emissions in the form of PM₁₀ emissions from the boilers are controlled by ESPs. The volatile HAP emissions from the boilers, lumber drying kilns, and from the diesel-fired emergency fire pump are released to the atmosphere uncontrolled.

[12/30/2010]

7.3 Control Device Descriptions

Table 7.1 Emissions unit name Description

Emissions Units / Processes	Control Devices	Emission Points

Emission Limits

7.4 HAP Emissions Limits

- Emissions of any single HAP from the entire facility shall be less than 10 tons per any consecutive 12-month period.
- Emissions of any combination of HAPs from the entire facility shall be less than 25 tons per any consecutive 12-month period.

In absence of any other creditable evidence, compliance with emission limits is assured by complying with this permit's operating, monitoring and recordkeeping requirements.

[12/30/2010]

Operating Requirements

7.5 HAP Emissions Operating Requirements

The permittee shall operate the HAP emissions units in accordance with the respective operating requirements of the HAP emissions units specified in this permit.

[12/30/2010]

Monitoring and Recordkeeping Requirements

7.6 HAP Monitoring Requirements

- The permittee shall monitor and record the HAP emissions units in accordance with the respective monitoring and recordkeeping requirements of the HAP emissions units specified in this permit.
- The permittee shall estimate monthly and annually all single HAPs and total HAPs emissions from the entire facility to demonstrate compliance with HAP emissions limits. Emissions estimates of HAP shall be in the same methodology used in the application materials that submitted by the permittee for this permitting action. Annual emissions shall be determined by summing monthly emissions over the previous consecutive 12-month period. Records of this information shall remain on site in accordance with the Monitoring and Recordkeeping Requirements of the General Provisions of this permit.

[12/30/2010]

8 General Provisions

General Compliance

8.1 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.]

8.2 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]

8.3 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

8.4 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

8.5 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]

8.6 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

- 8.7** 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.
- 8.8** 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.
- 8.9** 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 and 4/11/15]

Monitoring and Recordkeeping

- 8.10** 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

- 8.11 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

- 8.12 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

- 8.13 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

- 8.14 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

- 8.15 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

- 8.16 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]