

# **Statement of Basis**

**Tier I Operating Permit No. T1-2017.0052**

**Project ID 61940**

**IFG Lewiston, LLC**

**Lewiston, Idaho**

**Facility ID 069-00003**

**Final**

**August 24, 2018**

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**Permit Writer**

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

<b>1.</b>	<b>ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE .....</b>	<b>3</b>
<b>2.</b>	<b>INTRODUCTION AND APPLICABILITY .....</b>	<b>4</b>
<b>3.</b>	<b>FACILITY INFORMATION .....</b>	<b>5</b>
<b>4.</b>	<b>APPLICATION SCOPE AND APPLICATION CHRONOLOGY .....</b>	<b>6</b>
<b>5.</b>	<b>EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY .....</b>	<b>6</b>
<b>6.</b>	<b>EMISSIONS LIMITS AND MRRR.....</b>	<b>9</b>
<b>7.</b>	<b>REGULATORY REVIEW .....</b>	<b>20</b>
<b>8.</b>	<b>PUBLIC COMMENT.....</b>	<b>24</b>
<b>9.</b>	<b>EPA REVIEW OF PROPOSED PERMIT .....</b>	<b>24</b>

APPENDIX A - EMISSIONS INVENTORY

APPENDIX B - FACILITY COMMENTS FOR DRAFT PERMIT

## 1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	CO <sub>2</sub> equivalent emissions
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
IFG	IFG Lewiston, LLC
km	kilometers
lb/hr	pounds per hour
m	meters
mbf	thousand board feet
MACT	Maximum Achievable Control Technology
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTE	potential to emit
PW	process weight rate
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T1	Tier I operating permit
T2	Tier II operating permit
TAP	toxic air pollutants
VOC	volatile organic compound

## 2. INTRODUCTION AND APPLICABILITY

IFG Lewiston, LLC is a manufacturer of wood products, and is located at 280 Sycamore Drive, Lewiston, Idaho. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit volatile organic compounds above the major source threshold of 100 tons-per-year. The facility is also classified as a major facility, as defined by Subsection 008.10.a, because it emits or has the potential to emit HAP above the major source thresholds of 10 tons-per-year for any single HAP and 25 tons-per-year for any combination of HAP.

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for IFG Lewiston, LLC.

The format of this Statement of Basis follows that of the permit. IFG Lewiston, LLC Tier I operating permit is organized into sections. They are as follows:

### **Section 1 – Acronyms, Units, and Chemical Nomenclature**

The acronyms, units, and chemical nomenclature used in the permit are defined in this section.

### **Section 2 - Tier I Operating Permit Scope**

The scope describes this permitting action.

### **Section 3 - Facility-wide Conditions**

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements (MRRR) sufficient to assure compliance with a permit condition follows the permit condition.

### **Sections 4 and 5 – Lumber Drying Kilns and Sawmill, Planer Mill, and Material Handling Equipment**

The emissions unit-specific sections of the permit contain the applicable requirements that specifically apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the Facility-wide Conditions Section. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements (MRRR) sufficient to assure compliance with an applicable requirement follows the applicable requirement.

### **Section 6 - Insignificant Activities**

This section contains a list of units or activities that are insignificant on the basis of size or production rate. Units and activities listed in this section must be listed in the permit application. The regulatory citation for units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

### **Section 8 - General Provisions**

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I facilities. The General Provisions have been reviewed by EPA and contain all terms and conditions required by IDAPA 58.01.01 et al as well as requirements from other air quality laws, rules and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and a rule or permit, the rule or permit shall govern.

### 3. FACILITY INFORMATION

#### 3.1 Facility Description

IFG Lewiston, LLC manufactures dimensional kiln-dried lumber. Wood residual in the forms of sawdust and chips are also produced as marketable products.

The facility is comprised of sawmill, lumber drying, and surfacing (planing).

Raw logs are debarked and cut to desired lengths before entering the sawmill building. In the sawmill building the cut and debarked logs are cut to maximize the amount of lumber obtained from each log. The rough-cut green lumber is stacked before being dried in the kilns.

Six double-track kilns are indirectly-fired and operate on processed steam obtained from the adjacent Clearwater Pulp and Paper facility. Dried lumber is removed from the kilns and either stored temporarily or sent to the surfacing department where the lumber is trimmed by saws, planed, sorted, stacked, strapped, and stored before shipment as final dimensional lumber product.

Wood chips, sawdust, planer dust, and sander dust from process equipment are conveyed to storage areas by either conveyor belt or pneumatic conveyance systems employing cyclones or baghouses.

#### 3.2 Facility Permitting History

##### Tier I Operating Permit History - Previous 5-year permit term July 24, 2013 to July 24, 2018

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from July 24, 2013. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

January 17, 2012 T1-2008.0183, Change in Ownership, Permit status (S)

March 26, 2014 T1-2012.0038, Project 61078, Tier I operating permit renewal, Permit status (A) then (S) when this permit is issued.

##### Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

January 17, 2012 P- 2010.0103, Change in Ownership, Permit status (S)

January 17, 2012 P- 2011.0135, Change in Ownership, Permit status (S)

October 25, 2012 P-2011.0135, Project 61077, Remove restriction on pine and consolidate P-2010.0103 with P-2011.0135, Permit status (S)

March 18, 2014 P- 2011.0135, Project 61240, Install two new lumber drying kilns and a new saw line, to upgrade equipment, and to increase production, Permit status (S)

September 15, 2016 P- 2011.0135, Project 61623, Changes to pneumatic handling system, Permit status (A)

## 4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

### 4.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit. It incorporates the requirements in Permit to Construct (PTC) number P-2011.0135 from project 61623 issued on September 15, 2016.

### 4.2 Application Chronology

September 20, 2017	DEQ received an application.
November 8, 2017	DEQ determined that the application was complete.
April 27, 2018	DEQ made available the draft permit and statement of basis for peer and regional office review.
May 2, 2018	DEQ made available the draft permit and statement of basis for applicant review.
May 21 – June 20, 2018	DEQ provided a public comment period on the proposed action.
July 6, 2018	DEQ provided the proposed permit and statement of basis for EPA review.
August 22, 2018	DEQ issued the final permit and statement of basis.

## 5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

### 5.1 Process No. 1 – Lumber Drying Kilns

The following table lists the emissions units and control devices associated with Lumber Drying Kilns.

**Table 5.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Devices	Emission Point.
1	4 Double-Track kilns – manufactured by Wellons	None	Each kiln has 20 vents
2	2 Double-Track kilns – manufactured by Wellons		Multiple vents

#### Drying Kilns

The six lumber drying kilns process green rough cut lumber of various wood species and dimensions by reducing the moisture content in the lumber. Process steam is supplied to IFG by the Clearwater Paper Corporation Pulp and Paper Division. 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.

## 5.2 Process No. 2 – Sawmill, Planer Mill and Material Handling Equipment

The following table lists the emissions units and control devices associated with the Sawmill, Planer Mill, and Material.

**Table 5.2 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Devices	Emission Point
3	Debarking, cutoff saws 27-inch, 35-inch, and 50-inch debarkers; 27-inch, 35-inch cutoff saws	Reasonable control	
4	Main sawmill	Cyclones	CY1 stack Stack for CY2A and CY2B
5	Small log line	Sawmill baghouse	BH-3 stack
6	Planer mill	Chips cyclone followed by a chips baghouse	BH-2 stack
		Shavings cyclone followed by a shavings baghouse	BH-1 stack
7	Fuel Hog	Fuel hog cyclone	CY5 stack
8	Vacuum Cleanup System	Baghouse	BH1A
9	Shavings Bin Vent	Baghouse	BH1B

### Sawmill

Chips and sawdust from the large log sawmill are transported via conveyor to an offsite location. Negative air systems above the machine centers are used whenever the equipment is operated to collect entrained sawdust and transport it to the sawmill cyclones (CY1, CY2A and CY2B). The materials collected in the three sawmill cyclones are collected within the chip vault and transported to an offsite location.

The small log line allow processing of smaller logs and is housed in a new building or an addition to the existing main sawmill building, which is under negative pressure from the cyclones and/or small log line baghouse (BH3). The small log line baghouse system transports sawdust and wood residuals from the small log line and is located on the south side of the sawmill building(s).

Chips from the main sawmill and small log line drop to the Chip Conveyor and are conveyed to an off-site wood pile.

### Planar Mill

Dried lumber is removed from the kilns and either stored temporarily or sent to the planer mill building where the lumber is trimmed by saws, planed, sorted, stacked, strapped, and stored before shipment.

A new planer shavings material handling cyclone (CY4) will be near the truck bins at the new location. Emissions from the planer shavings cyclone will be routed to an emissions control baghouse (BH-1.)

Planer chips are transported through Bruks chipper cyclone that vents to the chips baghouse (BH-2). Chips collected by Bruks chipper cyclone (CY3) drop onto chip conveyor and are conveyed to an off-site wood pile.

### Fuel Hog

The Fuel Hog is used to chop waste materials (e.g., wood waste) into smaller pieces for use as boiler fuel. The Fuel Hog emission point is a cyclone (CY5) which is used to pneumatically transfer the hogged fuel to an off-site fuel pile.

### 5.3 Insignificant Emissions Units Based on Size or Production Rate

This section contains a list of units or activities that are insignificant on the basis of size or production rate. Units and activities listed in this section must be listed in the permit application. The following table lists the units and activities which have been determined to be insignificant on the basis of size or production rate. The regulatory authority for emissions units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

**Table 5.3 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION**

Emissions Unit / Activity	Regulatory Authority / Justification
Two 10,000 gallon Diesel Tanks	IDAPA 58.01.01.317.01.b.i(3)
Two Diesel Dispensing Pumps	IDAPA 58.01.01.317.01.b.i(3)
500-gallon gasoline storage tank	IDAPA 58.01.01.317.01.b.i(3)
Gasoline dispensing pump	IDAPA 58.01.01.317.01.b.i(3)
One 500 Gallon Propane Tank	IDAPA 58.01.01.317.01.b.i(4)
One Propane Dispensing System	IDAPA 58.01.01.317.01.b.i(4)
Process tanks and storage tanks containing various oil types	IDAPA 58.01.01.317.01.b.i(2)

To qualify as insignificant under IDAPA 58.01.01.317.01.b.i.3, emission units must have no greater than 10,000 gallon capacity, a maximum vapor pressure of 80 mm Hg at 21°C with appropriate closure. Also, to comply with this rule, the storage tank and activities of operation, loading, and unloading shall only be used for storage of volatile organic compounds and gasoline.

To qualify as insignificant under IDAPA 58.01.01.317.01.b.i.4, emission units must have less than 40,000 gallon capacity. Also, to comply with this rule, the storage tank and activities of operation, loading, and unloading shall only be used for storage of butane, propane, or liquefied petroleum.

To qualify as insignificant under IDAPA 58.01.01.317.01.b.i.2, tanks and associated activities including operation, loading and unloading of storage tanks must not have greater than one thousand one hundred (1,100) gallon capacity, must have lids or other appropriate closure, are not for use with hazardous air pollutants, and must not exceed a maximum vapor pressure of five-hundred fifty (550) mm Hg.

[IDAPA 58.01.01.317.01.b, 3/30/07]

### 5.4 Emissions Inventory

The Emissions Inventory – Potential to Emit Table summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

The documentation provided by the applicant for the emissions inventory and emission factors can be found in its underlying PTC No. P- 2011.0135 project 61623 issued on September 15, 2016.

**Table 5.4 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)**

Source Description	PM <sub>10</sub> T/yr	PM <sub>2.5</sub> T/yr	VOC T/yr
<b>Point Sources</b>			
<b>Lumber Drying</b>			
Kiln Vents	8.93	7.76	249.1
<b>Cyclones</b>			
CY1, Sawmill Machine Center Cyclone	0.033	0.016	----
CY2A&B, Sawmill Machine Center Cyclones	0.196	0.098	----
CY3 is integrated with Planer Chip Baghouse			----
CY4 vents to the Planer Shavings Baghouse	0.850	0.425	----
CY5, Fuel Hog Cyclone			
<b>Baghouses</b>			
BH1 (Shavings Baghouse)	1.025	0.686	
BH1A (Bin Vent Baghouse)	1.78E-03	1.19E-03	
BH1B (Bin Cleanup System Baghouse (optional))	1.10E-02	7.34E-03	----
BH2 (Chips Cyclone Baghouse)	1.41E-02	9.45E-03	----
BH3 (Hew Saw Baghouse)	1.988	1.332	----
<b>Fugitive Sources</b>			
Debarkers	4.65	0.824	----
Log Bucking, Cutoff Saws	0.247	0.123	----
Sawdust Bin, Truck Loadout Green	0.0002	0.00003	----
Planer Shavings Bin/Truck Loadout, Dry	0.014	0.002	----
Fugitive Dust – Paved Roads	0.52	0.127	----
Fugitive Dust – Unpaved Roads	4.22	0.422	----
<b>Total Emissions</b>	<b>18.48</b>	<b>11.41</b>	<b>249.10</b>

## 6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this T1 facility.

This section is divided into the following subsections.

- Facility-Wide Conditions;
- Lumber Drying Kilns Emissions Limits;
- Sawmill, Planer Mill, and Material Handling Equipment Emissions Limits;
- Tier I Operating Permit General Provisions.

### **MRRR**

Monitoring, recordkeeping and reporting requirements (MRRR) are the means with which compliance with an applicable requirement is demonstrated. In this section, the applicable requirement (permit condition) is provided first followed by the MRRR. Should an applicable requirement not include sufficient MRRR to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate

monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit (i.e. gap filling). In addition to the specific MRRR provided for each applicable requirement, generally applicable facility-wide conditions and general provisions may also be provided, such as performance testing, reporting, and certification requirements.

The legal and factual basis for each permit condition is provided for in this document. If a permit condition was changed due to facility draft comments or public comments, an explanation of the changes is provided.

### ***State Enforceability***

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

### ***Federal Enforceability***

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

## **6.1 Facility-Wide Conditions**

### **Permit Condition 3.1 - Fugitive Dust**

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

[IDAPA 58.01.01.650-651, 3/30/07]

### **MRRR (Permit Conditions 3.2 through 3.4)**

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct facility-wide inspections of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

### **Permit Condition 3.5 - Odors**

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

### **MRRR (Permit Condition 3.6)**

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State only), 5/1/94]

### **Permit Condition 3.7 - Visible Emissions**

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

### **MRRR (Permit Condition 3.8 through 3.9)**

- Conduct facility-wide inspections of all emissions units subject to the visible emissions standards (or rely on continuous opacity monitoring);
- If visible emissions are observed, take appropriate corrective action and/or perform a Method 9 opacity test;
- Maintain records of the results of each visible emissions inspection.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

### **Permit Conditions 3.10 through 3.14 - Excess Emissions**

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the excess emissions facility wide conditions and the regulations of IDAPA 58.01.01.130-136.

### **MRRR (Permit Conditions 3.11 through 3.14)**

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory;
- Notify DEQ of each excess emissions events as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ;
- Maintain records of each excess emissions event.

### **Permit Condition 3.15 - Sulfur Content Limits**

The permittee shall not sell, distribute, use, or make available for use any of the following:

- Distillate fuel oil containing more than the following percentages of sulfur:
  - ASTM Grade 1 fuel oil, 0.3% by weight.
  - ASTM Grade 2 fuel oil, 0.5% by weight.
- Coal containing greater than 1.0% sulfur by weight.
- DEQ may approve an exemption from these fuel sulfur content requirements (IDAPA 58.01.01.725.01 725.04) if the permittee demonstrates that, through control measures or other means, SO<sub>2</sub> emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 3/29/10]

### **MRRR - (Permit Condition 3.16)**

The permittee shall maintain documentation of supplier verification of fuel sulfur content on an as received basis.

**Permit Condition 3.17 - Open Burning**

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

[IDAPA 58.01.01.600-623, 5/08/09]

**MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 3.18 - Asbestos**

The permittee shall comply with all applicable requirements of 40 CFR 61, Subpart M—“National Emission Standard for Asbestos.”

[40 CFR 61, Subpart M]

**MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 3.19 - Accidental Release Prevention**

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance is present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

**MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 3.20 - Recycling and Emissions Reductions**

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

**MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

**Permit Condition 3.21 - Monitoring and Recordkeeping**

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application.

Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

#### **Permit Conditions 3.22 through 3.25 - Performance Testing**

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

#### **MRRR (Permit Conditions (3.23 and 3.25))**

The permittee shall submit compliance test report(s) to DEQ following testing.

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

#### **Permit Condition 3.26 - Reports and Certifications**

This permit condition establishes generally applicable MRRR for submittal of reports, certifications, and notifications to DEQ and/or EPA as specified.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

#### **Permit Condition 3.27 - Incorporation of Federal Requirements by Reference**

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein.

[IDAPA 58.01.01.107, 4/7/11]

#### **MRRR**

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

## **6.2 Lumber Drying Kilns-Specific Emissions Limits and MRRR**

### **Permit Condition 4.1**

The combined VOC emissions from the six lumber drying kiln vents shall not exceed 249 tons per any consecutive 12- calendar month period.

### **MRRR - (Permit Conditions 4.6 and 4.7)**

Permit Condition 4.6 requires monitoring the throughput of groups of lumber each month and each consecutive 12-month period. Permit Condition 4.7 requires calculating VOC emissions using the listed emission factors for each lumber group and the corresponding throughput for that group or a DEQ approved alternative.

### **Permit Conditions 4.2 and 4.4**

PC 4.2 states that the maximum 24-hour averaged emissions from each drying kiln shall not exceed 0.33 lb/hr for PM<sub>2.5</sub>.

PC 4.4 is an operating requirement to ensure compliance with the above PM<sub>2.5</sub> emissions limit. It states that the permittee shall not dry Western Hemlock except for Western Hemlock in the Hem-Fir group that consists of Grand Fir, White Fir, Alpine Fir, and 10% or less by volume of Western Hemlock.

### **MRRR - (Permit Condition 4.8)**

Permit Condition 4.8 is a monitoring requirement to ensure compliance with the operating requirement in PC 4.3. It states that each month, the permittee shall record the maximum volume percentage of Western Hemlock in Hem-Fir group and state in the records that the permittee complies with Permit Condition 4.3 Operational Limit on Western Hemlock for that month

### **Permit Condition 4.3**

The throughput of lumber for the drying kilns shall not exceed 470,000 thousand board feet (mbf) during any consecutive 12-month period.

### **MRRR - (Permit Condition 4.5)**

Each month the permittee shall monitor and record the total throughput of all species of lumber processed in the drying kilns in units of thousand board feet (mbf) for that month and for the most recent consecutive 12-month period.

## **6.3 Sawmill, Planer Mill and Material Handling Equipment-Specific Emissions Limits and MRRR**

### **Permit Conditions 5.1 and 5.2**

These conditions include the process weight rate emission limitations; these requirements are from IDAPA 58.01.01.701 & 702.

### **MRRR - (Permit Conditions 5.3 through 5.8)**

As long as the facility is operating as it is designed, as specified in Permit Conditions 5.3 through 5.8, each process will meet the respective process weight standard.

### **Permit Conditions 5.3 through 5.8**

These are operating requirements to ensure compliance with PM<sub>10</sub>/PM<sub>2.5</sub> 24-hour NAAQS according to the underlying PTC. They are listed as follows:

### Main Sawmill

The permittee shall install and operate the cyclones (CY1 and CY2A and CY2B) at all times when the main sawmill is operated to control emissions from the main sawmill as described under summary description of this section.

### Small Log Line

The permittee shall install and operate a baghouse (BH-3) at all times when the small log line is operated to control PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the small log line as described under summary description of this section.

The PM<sub>10</sub> emissions concentration from the small log line baghouse shall not exceed 0.003 grain per cubic feet.

### Chips Baghouse

The permittee shall install and operate a baghouse (BH-2) at all times when the planer mill is operated to control PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the chips cyclone as described under summary description of this section.

### Shavings Baghouse

The permittee shall install and operate a baghouse (BH-1) at all times when the planer is operated to control PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the shavings cyclone as described under summary description of this section.

### Shavings Area Vacuum Cleanup

The permittee shall install and operate a baghouse (BH1B) on the vacuum cleanup system whenever it is used cleanup the shavings area.

### Shavings Bin Vent

The permittee shall install and operate a baghouse (BH1A) on the shavings bin whenever shavings are transferred to the bin.

### **MRRR - (Permit Conditions 5.9 and 5.10)**

PC 5.9 states that IFG shall inspect each cyclone as listed in Table 5.1 every six months. The inspection shall be to assure that the cyclone is not plugged, eroded or otherwise not functioning as designed. The permittee shall maintain records of the inspections and any maintenance conducted. As long as the facility is operating as it is designed for as specified in Permit Conditions 5.3 through 5.8, each process will meet the respective process weight standard.

PC 5.10 states that for each baghouse (i.e., BH-1, BH-2, and BH-3), within 60 days of initial start-up, the permittee shall have developed a Baghouse System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from each respective emissions unit.

The operating, monitoring and recordkeeping requirements specified in the Baghouse/Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

The permittee shall keep documentation (e.g., manufacturer's specifications) on-site showing that PM<sub>10</sub> emissions concentration of the small log line baghouse is 0.003 grain per cubic feet or less.

### **MRRR - (permit Condition 5.9 and 5.10)**

These were modeled as negative emissions sources and are required to be eliminated. PC 5.9 and 5.10 require reporting and recordkeeping of the currently installed equipment base.

## **6.4 General Provisions**

Unless expressly stated, there are no MRRR for the general provisions.

### **General Compliance, Duty to Comply**

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

### **General Compliance, Need to Halt or Reduce Activity Not a Defense**

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

### **General Compliance, Duty to Supplement or Correct Application**

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

### **Reopening, Additional Requirements, Material Mistakes, Etc.**

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

### **Reopening, Permitting Actions**

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

### **Property Rights**

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

### **Information Requests**

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

### **Information Requests, Confidential Business Information**

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

### **Severability**

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

## **Changes Requiring Permit Revision or Notice**

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

## **Federal and State Enforceability**

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98; Idaho Code §39-108; 40 CFR 70.6(b)(1), (2)]

## **Inspection and Entry**

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

- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- 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; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

## **New Applicable Requirements**

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

## **Fees**

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

## **Certification**

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

## Renewal

The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

## Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
  - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
  - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
  - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;  
IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;  
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

## Compliance Schedule and Progress Reports

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

### **Periodic Compliance Certification**

The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as specified.

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified;
- All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended,  
62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

### **False Statements**

The permittee may not make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

### **No Tampering**

The permittee may not render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

### **Semiannual Monitoring Reports.**

In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months as specified.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

### **Reporting Deviations and Excess Emissions**

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

### **Permit Revision Not Required, Emissions Trading**

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

## **Emergency**

In accordance with IDAPA 58.01.01.332, an “emergency” as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

## **7. REGULATORY REVIEW**

### **7.1 Attainment Designation (40 CFR 81.313)**

The facility is located in Nez Perce County which is designated as attainment or unclassifiable for PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>2</sub>, SO<sub>x</sub>, and Ozone. Reference 40 CFR 81.313.

### **7.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)**

The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit volatile organic compounds above the major source threshold of 100 tons-per-year. The facility is also classified as a major facility, as defined by Subsection 008.10.a, because it emits or has the potential to emit hazardous air pollutants above the major source thresholds of 25 tons-per-year for any combination of HAP and 10 tons-per-year for a single HAP.

### **7.3 PSD Classification (40 CFR 52.21)**

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

*(From P-2011.0135 Statement of Basis, issued March 18, 2014)*

On February 6, 1997, during a time when the sawmill was owned by the same company as the adjacent Pulp Mill/ Consumer Products Divisions, the Idaho Office of Attorney General determined that the Lumber Products Division (sawmill) is a separate facility from the adjacent Pulp Mill/Consumer Products Divisions even though the steam used to dry lumber at the sawmill comes entirely from the pulp mill. The two facilities have different primary SIC codes, and the lumber mill does not serve as a support facility for the Pulp Mill or Consumer Products Divisions.

The location of the facilities remains the same, but the sawmill is now owned by IFG, a different entity than owns the adjacent Pulp Mill/ Consumer Products Divisions which further supports that the sawmill is not to be grouped with the adjacent Pulp Mill/Consumer Products Divisions. Additional support for the sawmill being a separate facility from the Pulp Mill/Consumer Products Divisions is published in the Federal Register, August 7, 1980, page 52695, “Where a single unit is used to support two otherwise distinct sets of activities, the unit is to be included within the source which relies most heavily on its support. For example, a boiler might be used to generate process steam for both a commonly controlled and located kraft pulp mill and a plywood manufacturing plant. If the yearly boiler output is used primarily by the pulp mill, then the total emissions of the boiler should be attributed to the mill.” None of the boilers at the adjacent but separately owned Pulp Mill/Consumer Products Divisions sends 50% or more of the steam produced to the lumber drying kilns.

The IFG sawmill is not a designated facility, and IFG has requested to limit its potential to emit below 250 tons per year for VOC, and therefore is not a major facility for PSD purposes.

### **7.4 NSPS Applicability (40 CFR 60)**

The facility does not have emissions units that are affected by the NSPS.

### **7.5 NESHAP Applicability (40 CFR 61)**

The facility does not have emissions units that are affected by 40 CFR 61.

## 7.6 MACT Applicability (40 CFR 63)

### 40 CFR 63 Subpart DDDD - National Emission Standards for Hazardous Air Pollutant: Plywood and Composite Wood Products (PCWP)

In accordance with 40 CFR 63.2231, lumber drying kilns located at major sources of HAP emissions are defined as affected emission units. However the only applicable requirement that applies to IFG is the initial notifications, as specified in 40 CFR 63.9(b)(2). Initial notification was required within 120 calendar days of October 1, 2007, the effective date of the MACT. Therefore, no requirements regarding this subpart are included in the Tier I operating permit.

### 40 CFR 63 Subpart CCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

In accordance with 40 CFR 63.11111(a), an affected source that is subject to this subpart is a gasoline dispensing facility located at an area source. IFG Lewiston is a major source for NESHAP purposes. Therefore, no requirements regarding this subpart are included in the Tier I operating permit.

## 7.7 CAM Applicability (40 CFR 64)

The factual basis, provided below, for CAM permit conditions are copied from the January 23, 2008 Statement of Basis which supported the issuance of Tier I Operating Permit No. T1-2007.0095.

While the principles used in the following still apply, IFG has modified their processes and emissions units in 2014. Because IFG's emissions units are not *large pollutant-specific emissions units* as defined in 40 CFR 64.5(a), IFG is allowed to conduct a CAM analysis at the time of the renewal of this Tier I operating permit in accordance with 40 CFR 64.5(b). Permit Condition 3.27 has stated this. This Tier I operating permit will expire on July 24, 2018.

From the January 23, 2008 statement of basis -

CAM applies to an emission unit with potential pre-control device emissions greater than 100% of the major source threshold for a regulated air pollutant and that uses a control device to achieve compliance with an applicable requirement for the regulated air pollutant.

The control equipment identified at the facility are baghouses. The cyclones are process equipment and not considered control equipment.

#### Cyclone Applicability Determination

The cyclones were determined to be process equipment, and not control equipment, as follows:

*In CAM definitions, 40 CFR 64.1, "Control device" means equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere. The types of equipment that may commonly be used as control devices include, but are not limited to, fabric filters, mechanical collectors, electrostatic precipitators, inertial separators, afterburners, thermal or catalytic incinerators, adsorption devices (such as carbon beds), condensers, scrubbers (such as wet collection and gas absorption devices), selective catalytic or non-catalytic reduction systems, flue gas recirculation systems, spray dryers, spray towers, mist eliminators, acid plants, sulfur recovery plants, injection systems (such as water, steam, ammonia, sorbent or limestone injection), and combustion devices independent of the particular process being conducted at an emissions unit (e.g., the destruction of emissions achieved by venting process emission streams to flares, boilers or process heaters). For purposes of this part, a control device does not include passive control measures that act to prevent pollutants from forming, such as the use of seals, lids, or roofs to prevent the release of pollutants, use of low-polluting fuel or feedstocks, or the use of combustion or other process design features or characteristics. If an applicable requirement establishes that particular equipment which otherwise meets this definition of a control device does not constitute a control device as applied to a particular pollutant-specific emissions unit, then that definition shall be binding for purposes of this part."*

This definition applies to control devices, such as inertial separators (cyclones), other than inherent process equipment, that are used to remove air pollutants.

Inherent process equipment is defined as follows:

*“Equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered a control device.”*

In an e-mail dated 7/18/07, the facility’s consultant wrote the following explanation of use of the cyclones:

*At LWP, larger cyclones are used to transfer wood residuals (sawdust, shavings, bark, etc), with exhaust air venting directly to atmosphere. These cyclones were installed with the primary purpose of moving material; similar equipment may be found at virtually any sawmill in the country, regardless of local air pollution requirements. These cyclones (CY-1, 2, 3, 4, and 6 at Specialties; CY-18, 25 at Surfacing; CY-26, 27A, 27B at the sawmill; and CY-FH at the fuel hog) are clearly inherent process equipment, as defined in 64.2 (excerpted above). Consequently, a CAM plan is not required for them.*

(As per the T1-2017.0052 permit renewal application, it should be noted that CY-26 was removed in 2012 and is now CY-1; CY27-A and CY27-B are now referred to as CY2A and CY2B; and IFGCY5 is now referred to as CY5.)

*LWP also uses cyclones used to collect and dispose of metal files in the saw filing room. These cyclones are very small, and are appropriately listed as insignificant emission units in Appendix D of the Tier I renewal application.*

In addition, a letter from the EPA, dated Nov. 27, 2005, identified three findings that should be considered in making a case-by-case judgment as to whether certain devices or practices should be treated as pollution controls or as inherent to the process:

1. Is the primary purpose of the equipment to control air pollution?
2. Where the equipment is recovering product, how do the cost savings from the product recovery compare to the cost of the equipment?
3. Would the equipment be installed if no air quality regulations are in place?

The facility’s consultant addressed Items No. 1 and No. 3 in the 7/18/07 e-mail, and addressed Item No. 2 in a 7/24/07 e-mail as follows:

*“Although the primary product is lumber, the sawdust, bark, shavings, chips, and trimmings (which I refer to as wood residuals) have value and may be sold. For example, bark may be sold for gardens, chips to pulp mills, shavings for animal bedding – and all of it can be sold for hog fuel. Consequently, I think cyclones may be considered process equipment that is recovering a product, even if it may not be the primary product. Eventually, the recovery of this secondary product pays for the cyclone and pneumatic blower system, but I don’t know the economics.”*

Based on this information, it has been determined that the cyclones are necessary for the proper functioning of the process, the cyclones are operated primarily for purposes other than compliance with air pollution regulations, and the recovered secondary product from the cyclones can be sold to recover the cost of the cyclone. The cyclones have been determined to be inherent process equipment and are therefore not subject to CAM.

#### Baghouse Applicability Determination

CAM applicability for the baghouses is determined as follows:

The facility is subject to Title V permitting requirements

The process weight rate limits (applicable requirements) which apply to the units which use the baghouses are not an emission limitation or standard that is exempt in accordance with 40 CFR 64.2(b). The baghouses are used to control particulate emissions from various wood processing operations at the facility. The baghouses are required to be used to achieve compliance with the process weight rate rule, IDAPA 58.01.01.700.

Uncontrolled PM/PM<sub>10</sub>/PM<sub>2.5</sub> for baghouses BH1, BH1A, and BH2 must be demonstrated to be greater than 100 T/yr.

The following table contains data used to demonstrate whether or not CAM rules are applicable to the baghouses.

**Table 7.1. Baghouse CAM Applicability Data**

Baghouse	Uncontrolled PM (T/yr)	Uncontrolled PM <sub>10</sub> (T/yr)	Uncontrolled PM <sub>2.5</sub> (T/yr)	Associated Process Equipment	Are Uncontrolled Emissions less than 100 T/yr?
BH1, Shavings Baghouse	12.81	10.89	6.40	Shavings Cyclone	Yes
BH1A, Bin Vent Baghouse	0.019	0.009	0.001	Shavings Bin Vent	Yes
BH2, Primary Chip Baghouse	7.05	5.99	3.53	Planer Chip Cyclone	Yes

BH1 is used as control equipment for CY4, a planer shavings material handling cyclone, is located near the truck bins. The analysis for BH1 CAM applicability was determining whether the CY4 PM/PM<sub>10</sub>/PM<sub>2.5</sub> were greater than 100 T/yr. The emissions from CY4 were calculated using Oregon DEQ Wood Products Emission factors AQ-EF02 for a medium efficiency cyclone. Since the cyclone could potentially handle planer chips, as well, calculations were completed using 51,230 BDT/yr. The Baghouse CAM Applicability Data table demonstrates that uncontrolled PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions for BH1 were less than 100 T/yr and, therefore, CAM rules (40 CFR 64) do not apply.

BH1A is used as control equipment for the truck bin. The analysis for BH1A CAM applicability was determining whether the loadout operation has uncontrolled PM emissions greater than 100 T/yr. The shavings bin could potentially include planer chips as well as planer shavings. Calculations were done using EPA FARR Emission Factors "EPA Region 10 Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country, May 2014"- Drop of Dry Material. The Baghouse CAM Applicability Data table demonstrates that uncontrolled PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions for BH1A were less than 100 T/yr and, therefore, CAM rules (40 CFR 64) do not apply.

BH2 is used as control equipment for the planer chips from the planer mill after a cyclone. The analysis for BH2 CAM Applicability included determining whether the uncontrolled PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the mill cyclone are greater than 100 T/yr. The emissions were calculated using emission factors from Oregon DEQ Wood Products Emission factors AQ-EF02 for a medium efficiency cyclone. The Baghouse CAM Applicability Data table demonstrates that uncontrolled PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions for BH2 were less than 100 T/yr and, therefore, CAM rules (40 CFR 64) do not apply.

BH3 is a material handling baghouse used as process equipment to separate material from the pneumatic stream. It does not control cyclone emission.

### 7.8 Insignificant Activities (IDAPA 58.01.01.317.01(b)(i))

Insignificant activities that are listed in Permit Table 6.1 based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.3 are required to meet the criteria of operation, loading and unloading of volatile organic compound storage tanks, ten thousand (10,000) gallons capacity or less, with lids or other appropriate closure and vapor pressure not greater than eighty (80) mm Hg at twenty-one (21) degrees C.

Operation, loading and unloading of gasoline storage tanks, ten thousand (10,000) gallons capacity or less, with lids or other appropriate closure.

Insignificant activities that are listed in Permit Table 6.1 based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.4 are required to meet the criteria of operation, loading and unloading storage of butane, propane, or liquefied petroleum gas (LPG), storage tanks, where vessel capacity is less than forty thousand (40,000) gallons.

Insignificant activities that are listed in Permit Table 6.1 based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.2 are required to meet the criteria of operation, loading, and unloading of storage tanks, that are not greater than one thousand one hundred (1,100) gallon capacity, with lids or other appropriate closure, are not for use with hazardous air pollutants, and must maintain maximum vapor pressure five-hundred fifty (550) mm Hg.

**7.9 Acid Rain Permit (40 CFR 72-75)**

The facility is not subject to the acid rain permit requirements.

**8. PUBLIC COMMENT**

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from May 21, 2018 to June 20, 2018. During this time, comments were submitted in response to DEQ's proposed action.

**9. EPA REVIEW OF PROPOSED PERMIT**

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on July 6, 2018 via e-mail. No comments were received.

## Appendix A - Emissions Inventory

**IDAHO FOREST GROUP  
LEWISTON, IDAHO  
Potential to Emit Emission Inventory**

	PM10 (ton/yr)	PM2.5 (ton/yr)	SO <sub>2</sub> (ton/yr)	NOx (ton/yr)	VOCs (ton/yr)	CO (ton/yr)
<b>Point Sources</b>						
Lumber Dry Kilns	8.93	7.76	---	---	249.1	---
CY1, Sawmill Machine Center Cyclone	0.033	0.016	---	---	---	---
CY2A&B, Sawmill Machine Center Cyclones	0.196	0.098	---	---	---	---
CY5, Fuel Hog Cyclone	0.850	0.425	---	---	---	---
BH1, Planer Shavings Baghouse	1.02	0.686	---	---	---	---
BH1A, Shavings Bin Vent Baghouse	0.0018	0.0012	---	---	---	---
BH1B, Housekeeping Baghouse(2)	0.0110	0.0073	---	---	---	---
BH2, Planer Chip Baghouse	0.0141	0.0094	---	---	---	---
BH3, Hew Saw Baghouse	1.9885	1.3323	---	---	---	---
<b>Point Source Total Emissions</b>	<b>13.05</b>	<b>10.33</b>	<b>0.00</b>	<b>0.00</b>	<b>249.10</b>	<b>0.00</b>
<b>Process Fugitive Sources</b>						
Debarkers	4.65	0.824	---	---	---	---
Log Bucking, cutoff saws	0.247	0.123	---	---	---	---
Chip Vault Loadout, Green	0.0002	0.00003	---	---	---	---
Planer Shavings Bin Loadout, dry	0.014	0.002	---	---	---	---
<b>Fugitive Sources</b>						
Fugitive Dust - Paved Roads	0.517	0.127	---	---	---	---
Fugitive Dust - Unpaved Roads	4.22	0.42	---	---	---	---
<b>Fugitive Totals</b>	<b>5.43</b>	<b>1.08</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

**Plantwide Total    18.48       11.41       0.0       0.0       249.1       0.0**

Fugitive Dust - Unpaved Roads  
 Calculations based on AP-42 Section 13.2.2, rev. 12/06

Source	Class	Number Trips Per Year	Distance per Trip (miles)	VMT per Year	Avg. Vehicle Weight W	Weighted Vehicle Weight
Log Trucks	Unpaved, Loaded	84,600	0.5	42,300	36	13.98
	Unpaved, Empty	84,600	0.5	42,300	16	6.21
Log Yard Loaders	Unpaved, Loaded	564,000	0.01	5,640	4	0.21
	Unpaved, Empty	564,000	0.01	5,640	1	0.05
Dump Truck Scrap Wood	Unpaved, Loaded	500	0.2	100	33	0.03
	Unpaved, Empty	500	0.2	100	13	0.01
Bucket Loaders Scrap Wood	Unpaved, Loaded	2,000	0.1	200	15	0.03
	Unpaved, Empty	2,000	0.1	200	10	0.02
Employees	Unpaved	62,400	0.20	12,480	3	0.34
				108,960		21

$E = [k(s/12)^a(w/3)^b]$

	PM	PM10	PM2.5
k =	4.9	1.5	0.15
Composite s =	0.6	0.6	0.6
W =	20.88	20.88	20.88
a =	0.7	0.9	0.9
b =	0.45	0.45	0.45

Log trucks drive 0.41 miles on gravel road (s=0.10%) and 0.11 miles on logyard (s=4.8%).  
 Table 13.2.2-1, B13s02.2.

Uncontrolled	E =	1.39 lb/VMT	0.23 lb/VMT	0.02 lb/VMT	
Uncontrolled	E <sub>ext</sub> =	0.93 lb/VMT	0.16 lb/VMT	0.02 lb/VMT	P = 120 N = 365
Controlled	E =	0.47 lb/VMT	0.08 lb/VMT	0.01 lb/VMT	Watering provides 50% control

<b>Total PM Emissions:</b>	<b>25.39</b>	<b>tpy</b>
<b>Total PM10 Emissions:</b>	<b>4.223</b>	<b>tpy</b>
<b>Total PM2.5 Emissions:</b>	<b>0.422</b>	<b>tpy</b>

## Fugitive Dust - Paved Roads

Calculations based on AP-42 Section 13.2.1.3, rev. 1/11

Source	Class	Number Trips Per Year	Distance per Trip (miles)	VMT per Year	Avg. Vehicle Weight W	Weighted Vehicle Weight
Fork Lifts	Paved, Loaded	156,667	0.10	15,667	4.2	0.76
	Paved, Empty	156,667	0.10	15,667	1	0.18
Lumber Trucks	Paved, Loaded	26,111	0.70	18,278	33	6.98
	Paved, Empty	26,111	0.70	18,278	13	2.75
Shavings Trucks	Paved, Loaded	18,524	0.50	9,262	33	3.54
	Paved, Empty	18,524	0.50	9,262	13	1.39
Misc. Vehicles incl employee	Paved	0	0.20	0	3	0.00
				86,412		15.60

$$E = k(sL)^{0.91}(W)^{1.02} * [1 - 1.2 * P/N]$$

	PM	PM10	PM2.5	P=	N=
k =	0.011	0	0.00		120
sL =	1.1	1	1.10		365
W =	15.6	15.6	15.6		
E =	0.1	0.0	0.0		
	lb/VMT	lb/VMT	lb/VMT		
% control from washing/sweeping	50%	50%	50%		

<b>Total PM Emissions:</b>	<b>2.59</b>	<b>tpy</b>
<b>Total PM10 Emissions:</b>	<b>0.52</b>	<b>tpy</b>
<b>Total PM2.5 Emissions:</b>	<b>0.13</b>	<b>tpy</b>

## BAGHOUSES

### PTE BAGHOUSE EMISSIONS

Process Equipment Baghouses Source	rate (gr/cf)	Flow cfm	PM10 e.f. lb/hr	PM25 e.f. lb/hr
BH3, Hew Saw Baghouse	0.003	17,655	0.454	0.304

Control Equipment Baghouses Source	PM10 ef (lb/ton)	reference	PM2.5 ef (lb/ton)	reference
BH1, Shavings Handling Baghouse	0.040	AQ-EF02, shavings	0.027	67% of PM10 <sup>(1)</sup>
BH2, Planer Chip Baghouse	0.001	AQ-EF02, chips	0.001	67% of PM10 <sup>(1)</sup>
BH1A, Shavings Bin Vent Baghouse	0.000070	Manufacturer Specifications	0.000047	67% of PM10 <sup>(1)</sup>
BH1B, Shavings Bin Housekeeping	0.0024	Baghouse Eff. 99.8%	0.0016	67% of PM10 <sup>(1)</sup>

(1) DEQ determined that baghouse PM2.5 should be calculated as 67% of PM10.

Source	Basis (hr/yr) or (tons/yr)	Production Units	Potential Emissions			
			PM10 (ton/yr)	Daily PM10 (lb/hr)	PM2.5 (ton/yr)	PM2.5 (lb/hr)
BH1, Planer Shavings Baghouse	51,230	tons/yr	1.025		0.686	
BH1, Shavings Handling Baghouse	164	tons/day		0.274		0.183
BH1A, Shavings Bin Vent Baghouse	51,230	tons/yr	1.78E-03		1.19E-03	
BH1A, Shavings Bin Vent Baghouse	164	tons/day		4.76E-04		3.19E-04
BH1B, Housekeeping Baghouse <sup>(2)</sup>	9,125	tons/yr	1.10E-02		7.34E-03	
BH1B, Housekeeping Baghouse <sup>(2)</sup>	36	tons/day		3.60E-03		2.41E-03
BH2, Planer Chip Baghouse	28,200	tons/yr	0.014		0.009	
BH2, Planer Chip Baghouse	90	tons/day		0.004		0.003
BH3, Hew Saw Baghouse	8,760	hours/yr	1.988	0.454	1.332	0.304
Conversion of minutes to hours	60	min/hr				
Conversion of grains to lbs	7000	gr/lb				

(2) Annual worst-case shavings pickup: 25 tons per day, 365 days per year. Hourly, 1.5 tons/hr

### CYCLONE EMISSION FACTORS

Potlatch developed cyclone emission factors for PM. IFG is using those emissions factors where possible, with corresponding factors for PM10 and PM2.5.

Source	PM10 e.f. (lb/ton)	PM2.5 e.f. (lb/ton)
CY1, Sawmill Machine Center Cyclone <sup>(1)(2)</sup>	0.165	0.082
CY2A&B, Sawmill Machine Center Cyclones <sup>(1)(2)</sup>	0.780	0.390
CY5, Fuel Hog Cyclone <sup>(1)(2)</sup>	0.170	0.085

Notes:

(1) Original note from Potlatch said: Calculated using cyclone and dust parameters per Rex. M. Robbins, Pollution

(2) PM<sub>2.5</sub> is 67% of PM<sub>10</sub>, as per IDEQ August 19, 2013 letter.

### CYCLONE EMISSIONS

HOURS OF OPERATION 5356 hours per year, consistent with operations  
ANNUAL SAWMILL PRODUCTION 470,000 MBDFT/YR

Source	Annual Throughput tons	Daily Throughput tons	Potential Emissions			
			PM10 (ton/yr)	Daily PM10 (lb/hr)	PM2.5 (ton/yr)	PM2.5 (lb/hr)
CY1, Sawmill Machine Center Cyclone	396	1.584	0.033	0.011	0.016	0.005
CY2A&B, Sawmill Machine Center Cyclones	503	2.012	0.196	0.065	0.098	0.033
CY5, Fuel Hog Cyclone	10,000	40	0.850	0.283	0.425	0.142

**Lumber Dry Kilns**

Proposed Annual Production 470,000 mbdf/yr, lumber dried  
 Max Daily Production 1443 mbf/day

**CRITERIA POLLUTANTS**

PM10:	Emission Factor:	0.038 lbs/1000 bd.	Willamette Ind. 1998 Source Tests
	Emissions:	8.93 tons/year	Douglas fir and Hemlock
		54.83 lbs/day	
		2.28 lbs/hr	
PM2.5:	Emission Factor:	0.033 lbs/1000 bd.	Willamette Ind. 1998 Source Tests
	Emissions:	7.76 tons/year	Douglas fir and Hemlock
		47.62 lbs/day	
		1.98 lbs/hr	
VOC:	Emission Factor:	1.06 lbs/1000 bd.	Species-dependent emission factor
	Emissions:	249.10 tons/year	VOC Emissions based on
		56.87 lbs/hr	mix shown below.

**HAZARDOUS AIR POLLUTANTS**

Total HAP	Emission Factor:	0.4956 lbs/1000 bd.	Species-dependent emission factor
	Emissions:	116.47 tons/year	HAP Emissions based on
		26.59 lbs/hr	mix shown below.
Methanol, highest single HAP	Emission Factor:	0.420 lbs/1000 bd.	EPA 12-12 (Hem-fir)
	Emissions:	98.70 tons/year	HAP Emissions based on
		22.53 lbs/hr	mix shown below.

Wood Species, representative:	% of Total	VOC <sup>(a)</sup> (lb/MBdf)	Weighted (lb/Mbdf)
Ponderosa Pine & Other Species	0.0%	4.43	0.00
ESLP: Englemann Spr. Lodgepole	0.0%	2.16	0.00
Douglas Fir/Larch	0.0%	1.70	0.00
Hemlock, Hem-fir	100.0%	1.06	1.06
Cedar/Redwood	0.0%	1.15	0.00
<b>Total</b>	<b>100.0%</b>		<b>1.06</b>

Notes: (a) Permit Table 4.2 (T1-2012.0038) Permit allows use of DEQ-approved alternative factors. IFG proposes use of 1.06 lb/mbf for Hem-Fir (rather than 1.09 lb/mbf) and will provide details upon request.

**Source Test Based Dry Kiln Emission Factors**  
 Units are pounds per thousand board feet (lb/MBF)

1998 Source Test	PM Total (lb/MBF)	PM <sub>10</sub> (lb/MBF)	PM <sub>2.5</sub> (lb/MBF)
Coastal Hemlock	0.051	0.051	0.048
Douglas-fir	0.024	0.024	0.018
<b>Average</b>	<b>0.038</b>	<b>0.038</b>	<b>0.033</b>

Total PM was assumed to be PM10. Condensable fraction was determined to be PM2.5 fraction

**Dry Kiln Haps, All**

Lumber Species	Maximum Potential mbf/yr	% Ponderosa Pine	%ESLP	% Douglas Fir/Larch	% Hem-Fir	% Cedar/Redwood
	470,000	0%	0%	0%	100%	0%
		0	0	0	470,000	0
		0	0	0	0	100%

EMISSION FACTORS:	Factors from 2015 Oregon DEQ Compilation					
	Total HAP	Methanol	Formal- dehyde	Acetal- dehyde	Propion- aldehyde	Acrolein
Ponderosa Pine	0.189	0.144	0.0092	0.0280	0.0032	0.0045
ESLP	0.115	0.078	0.0044	0.0310	0.0007	0.0010
Douglas Fir	0.163	0.117	0.0043	0.0396	0.0008	0.0012
Hem Fir	0.494	0.420	0.0160	0.0550	0.0014	0.0023
Cedar (<200)	0.246	0.122	0.0013	0.1200	0.0012	0.0015

EMISSIONS	Emission lb/Yr					
	Total HAP	Methanol	Formal- dehyde	Acetal- dehyde	Propion- aldehyde	Acrolein
Ponderosa Pine	0	0	0	0	0	0
ESLP	0	0	0	0	0	0
Douglas Fir	0	0	0	0	0	0
Hem Fir	232,274	197,165	7,520	25,850	658	1,081
Cedar (<200)	0	0	0	0	0	0
<b>TOTAL, lb/yr</b>	<b>232,274</b>	<b>197,165</b>	<b>7,520</b>	<b>25,850</b>	<b>658</b>	<b>1,081</b>
<b>TOTAL, ton/yr</b>	<b>116.14</b>	<b>98.58</b>	<b>3.76</b>	<b>12.93</b>	<b>0.33</b>	<b>0.54</b>

**MILL FUGITIVE SOURCES**

**Emission Factors (EF)**

Fugitive Emissions Source	PM10 EF	PM2.5 EF	Units	Control Efficiency.	Emission Factor Reference
Debarkers	0.011	0.0019	lb/ton logs	50%	AIRS 3-07-008-01, NCASI for %PM2.5. 50% control for partial enclosure
Log Bucking, cutoff saws	0.0175	0.0088	lb/ton logs	80%	FARR Factor for Log Bucking, controlled by enclosure.
Chip Vault Loadout, Green	0.00035	0.00006	lb/BDT chips in vault	0%	FARR drop factor "wet", no control
Planer Shavings Bin Loadout, dry	0.0007	0.0001	lb/BDT shavings	50%	FARR drop factor "dry", 50% control for sides panels

**Potential Emissions**

Fugitive Emissions Source	PM10	PM10	PM2.5	PM2.5	Notes
	tpy	lb/hr (daily)	tpy	lb/hr (daily)	
Debarkers	4.65	1.24	0.82	0.22	
Log Bucking, cutoff saws	0.247	0.066	0.123	0.033	Hog fuel is pneumatically transferred to Clearwater Paper
Chip Vault Loadout, Green	0.0002	0.00004	0.00003	0.0013	
Planer Shavings Bin Loadout, dry	0.0139	0.0037	0.0020	0.0003	

NCASI Special Report No. 15-01, Table 6.1 Average Total Potential Filterable PM10 and PM2.5 for Chips and Bark

Fresh Wood Chips	17.5% PM2.5 portion of PM10 emissions
Fresh Bark	17.7% PM2.5 portion of PM10 emissions
Hogged Bark	15.4% PM2.5 portion of PM10 emissions

**IDAHO FOREST GROUP, LEWISTON**  
**Production Information for Emissions Calculations**

**Lumber Production**

Daily Production is based on 7 days/wk for sawmill and planer

Sawmill	470,000	mbdft/year	1,506	mbdft/day
Dry Kilns	470,000	mbdft/year	1,443	mbdft/day
Planer	470,000	mbdft/year	1,506	mbdft/day
Logs Used	1,692,000	tons/yr	5,423	tons/day
Sawmill Hours	7,488	6 days/week, 52 weeks, projected maximum		
Planer Hours	7,488	6 days/week, 52 weeks, projected maximum		
Kiln Hours	8,760	hours/year, potential		

**NOTES**

Daily production based on 6-day weeks..  
Daily production based on kiln capacity.  
Daily production based on 6-day weeks..  
Estimated based on ratio.

**Residuals Production, full production**

	<b>BDT/yr</b>	<b>BDT/day</b>	<b>Estimation Factor</b>	
Sawmill Chips	352,500	1130	0.750	GT chips/mbdft sawmill
Sawdust	155,100	497	0.330	GT sawdust/mbdft sawmill
Hog Bark	141,000	452	0.300	GT bark/mbdft sawmill
Planer Chips	28,200	90	0.060	BDT/mbdft planer
Shavings	51,230	164	0.109	GT shavings/mbdft planer
Fines to Cyclones	900	2.9		From cyclone data
Wood to Fuel Hog	10,000	40.0		From mill data

	<b>Moisture Content</b>	<b>Green Wt. ton/year</b>	<b>ton/day</b>
Sawmill Chips	50%	705,000	2,260
Sawdust	50%	310,200	994
Hog Bark	50%	282,000	904
Planer Chips	15%	33,176	106
Shavings	15%	60,271	193

**NOTE: If built, baghouse BH1B will be a part of the vacuum system, which will not run without a baghouse.**  
**NOTE: Baghouse BH3 is not included in this analysis, as it is process equipment**

<b>BH1, SHAVINGS BAGHOUSE</b>				
BH1 is control equipment for CY4. Analysis for BH1 CAM applicability is whether CY4 PM emissions greater than 100 TPY				
<b>Emission Factors (Uncontrolled)</b>				
PM	PM10	PM2.5	Units	Reference
0.5	0.425	0.25	lb/bone dry ton	Oregon DEQ Wood Products Emission Factors AQ-EF02; Medium Efficiency Cyclone
<b>Process Production</b>				
51,230 BDT/year			CY4 could potentially handle planer chips as well as planer shavings.	
<b>Uncontrolled Emissions</b>				
PM	PM10	PM2.5	Units	
12.8075	10.88638	6.40375	Tons/year	
PM emissions are less than 100 TPY and BH1A is therefore not subject to CAM				

<b>BH1A, BIN VENT BAGHOUSE</b>				
BH1A is control equipment for the truck bin. Analysis for BH1A CAM applicability is whether the loadout has uncontrolled PM emissions greater than 100 TPY				
<b>Emission Factors (Uncontrolled)</b>				
PM	PM10	PM2.5	Units	Reference
0.00075	0.00035	0.00005	lb/bone dry ton	EPA FARR Emission Factors "EPA Region 10 Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country, May 2014" Drop of Dry Material
<b>Process Production</b>				
51,230 BDT/year			The shavings bin could potentially handle planer chips as well as planer shavings.	
<b>Uncontrolled Emissions</b>				
PM	PM10	PM2.5	Units	
0.019211	0.008965	0.001281	Tons/year	
PM emissions are less than 100 TPY and BH1A is therefore not subject to CAM				

<b>BH2, PRIMARY CHIP BAGHOUSE</b>				
BH2 is control equipment for planer chips from the planer mill after a cyclone. Analysis for BH2 CAM applicability is whether the uncontrolled PM emissions from chips from the mill cyclone are greater than 100 TPY				
<b>Emission Factors (Uncontrolled)</b>				
PM	PM10	PM2.5	Units	Reference
0.5	0.425	0.25	lb/bone dry ton	Oregon DEQ Wood Products Emission Factors AQ-EF02; Medium Efficiency Cyclone
<b>Process Production</b>				
28,200 BDT/year				
<b>Uncontrolled Emissions</b>				
PM	PM10	PM2.5	Units	
7.05	5.9925	3.525	Tons/year	
PM emissions are less than 100 TPY and BH1A is therefore not subject to CAM				

## Appendix B - Facility Comments for Draft Permit

**The following comments were received from the facility on May 11, 2018:**

**Facility Comment:** “Should have definition for PM10 as well”.

**DEQ Response:** PM<sub>10</sub> has been added to Section 1 of the Tier I permit. PM<sub>10</sub> was verified to already be in Section 1 of the Statement of Basis.

**Facility Comment:** The facility reworded part of the Summary Description of Section 5, as follows:

*The small log line ~~will allow processing of processes~~ smaller logs and is housed in a ~~new~~ separate building or an addition to the existing main sawmill building, which is under negative pressure from the ~~eyelones and/or~~ small log line baghouse (BH3). The small log line baghouse system will transport sawdust and wood residuals from the small log line ~~and will be located on the south side of the sawmill building(s) to the conveyor.~~*

*A planer shavings material handling cyclone (CY4) is installed near the truck bins. Emissions from the planer shavings cyclone ~~will be~~ routed to an emissions control baghouse (BH-1). Planer chips from the ~~are~~ ~~transported through Bruks chipper~~ are transported pneumatically to the integrated cyclone/baghouse unit eyelone that vents to the chips baghouse (BH-2). Chips collected by the ~~Bruks chipper~~ cyclone (CY3) drop onto a chip conveyor and are conveyed to an off-site wood pile.*

**DEQ Response:** These changes have been added to the Tier I permit.

**Facility Comment:** The facility reworded Permit Condition 5.7, as follows:

*If a vacuum cleanup system is installed, ~~The~~ the permittee shall install and operate a baghouse (BH1B) on the vacuum cleanup system whenever it is used cleanup the shavings area.*

**DEQ Response:** These changes have been added to the Tier I permit.

**Facility Comment:** Regarding permit condition 5.11, the facility indicated: “These sources were previously eliminated. IFG asks that Condition 5.11 be removed.”:

*5.11 Eliminated Emissions Sources*

*The following emissions sources shall be eliminated:*

- *Three existing planer shavings material handling baghouses (IFGBH1, IFGBH2, and IFGBH3.)*
- *The cyclone (IFGCY1) associated with the #4 splitter with the planer mill*
- *The truck bin cyclones (IFGCY6, IFGCY7 and IFGCY8) and the truck bin baghouse (IFGBH4.)*
- *Cedar Products processing*

**DEQ Response:** DEQ’s Lewiston Regional Office verified these changes have occurred. Permit Condition 11 has been removed. The reference to PC 5.11 in the Statement of Basis MRRR section has also been removed.

**Facility Comment:** The facility commented “IFG doesn’t have this detail in any other Idaho Tier I permit. These are not air quality regulations, they are covered in the SPCC plan. Can DEQ take these out?” regarding Section 6, Insignificant Activities, references to IDAPA rules as follows:

*Insignificant activities that are listed in Table 6.1 based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.3 are required to meet the criteria of operation, loading and unloading of volatile organic compound storage tanks, ten thousand (10,000) gallons capacity or less, with lids or other appropriate closure and vapor pressure not*

*greater than eighty (80) mm Hg at twenty-one (21) degrees C. Operation, loading and unloading of gasoline storage tanks, ten thousand (10,000) gallons capacity or less, with lids or other appropriate closure.*

*Insignificant activities that are listed in Table 6.1 based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.4 are required to meet the criteria of operation, loading and unloading storage of butane, propane, or liquefied petroleum gas (LPG), storage tanks, where vessel capacity is less than forty thousand (40,000) gallons.*

*Insignificant activities that are listed in Table 6.1 based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.2 are required to meet the criteria of operation, loading, and unloading of storage tanks, that are not greater than one thousand one hundred (1,100) gallon capacity, with lids or other appropriate closure, are not for use with hazardous air pollutants, and must maintain maximum vapor pressure five-hundred fifty (550) mm Hg.*

**DEQ Response:** The above referenced paragraphs contain a description of the regulatory justification the facility has used to qualify activities in Permit Table 6.1 as Insignificant, in accordance with IDAPA 58.01.01, Rules for the Control of Air Pollution in Idaho. These activities, listed in Table 6.1, must meet and continue to meet the requirements pursuant to those rules listed in the table. The description of requirements associated with those activities has been moved to the Statement of Basis. However, it should be noted that though these activities may or may not be subject to Federal and State rules for Spill Prevention, Control, and Countermeasure requirements, that is outside the scope of this Tier I permit renewal.