



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor
C. Stephen Allred, Director

June 28, 2002

CERTIFIED MAIL #7000 1670 0013 9129 4350

Mr. Jim Perry, Plant Manager
Louisiana-Pacific Corporation
P.O. Box 3159
Bonners Ferry, ID 83805

RE: AIRS Facility No. 021-00002, Louisiana-Pacific, Bonners Ferry
Permit to Construct Modification

Dear Mr. Perry:

The Department of Environmental Quality (Department) is issuing modified Permit to Construct (PTC) No. 021-00002 for the Louisiana-Pacific Bonners Ferry lumber mill in accordance with IDAPA 58.01.01.200 through 223, *Rules for the Control of Air Pollution in Idaho*. The enclosed PTC is effective immediately.

This permit does not release Louisiana-Pacific from compliance with all other applicable federal, state, or local laws, regulations, permits, and ordinances.

Tom Harman of the Coeur d'Alene Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. In addition to your facility's plant manager, the Department recommends that the following representatives of your firm also attend this meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Bill Rogers at (208) 373-0437 to address any concerns you may have with the enclosed permit.

Sincerely,

Marjorie Martz Emerson
FOR

Katherine B. Kelly, Administrator
Air Quality Division

KK/BR/bh Project No. P-010112 G:\AIR PERMITS\PTC\LP-BONNERS FERRY\FINAL\P-010112 LETTER.DOC

Enclosures

cc: Joan Lechtenberg, Air Quality Division Tom Harman, Coeur d'Alene Regional Office
Laurie Kral, EPA - Region 10 Sherry Davis, Technical Services Division



Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality

PERMIT NO.: 021-00002

AQCR: 063

CLASS: A

SIC: 2421

ZONE: 11

UTM COORDINATE (km): 549.8, 5393.6

1. PERMITTEE

Louisiana-Pacific Corp.

2. PROJECT

Permit to Construct Modification (Planer Shavings Baghouse)

3. MAILING ADDRESS

P.O. Box 3159

CITY

Bonnors Ferry

STATE

ID

ZIP

83805

4. FACILITY CONTACT

Jim Perry

TITLE

Plant Manager

TELEPHONE

(208) 267-3162

5. RESPONSIBLE OFFICIAL

Bruce Mallory

TITLE

Lumber General Manager

TELEPHONE

(503) 821-5263

6. EXACT PLANT LOCATION

6726 Riverside, Bonnors Ferry

COUNTY

Boundary

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Dimensional Lumber

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Idaho Department of Environmental Quality (Department) 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.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require Department approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

Marjorie Mertz Emerson for

KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: June 28, 2002

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 021-00002

Permittee: Louisiana-Pacific Corp.
Location: Bonners Ferry, Idaho

Date Issued: June 28, 2002

1. PERMIT TO CONSTRUCT SCOPE

Purpose

This permit to construct (PTC) incorporates and modifies the terms and conditions of the following permits:

- PTC No. 021-00002, issued October 26, 1999

Regulated Sources

Table 1.1 below lists all sources of emissions regulated in this PTC.

Table 1.1 SOURCES OF REGULATED EMISSIONS

Permit Section	Source Description	Emissions Control(s)
2	Planers	Planer shavings bin baghouse
3	Lumber-drying kilns	None
4	Sawmill (fugitive emissions)	Reasonable control

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2. PLANERS

Emission Limits

2.1 Stack Emission Limits

Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) emissions from the planer shavings bin baghouse stack shall not exceed any corresponding emission rate limit listed in the appendix of this permit.

2.2 Visible Emissions Limits

Visible emission limits from the shavings bin baghouse stack shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period, as required in IDAPA 58.01.01.625. Opacity shall be determined using the test methods and procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.3 Planer Throughput

The throughput to the planers shall not exceed 219 million board feet (MMbf) per any consecutive 12-month period.

2.4 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an Operations and Maintenance (O&M) manual for the shavings bin baghouse which describes the procedures that will be followed to comply with General Provision 2 and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.

2.5 Pressure Drop Across Air Pollution Control Device

The pressure drop across the air pollution control device shall be maintained within manufacturer and O&M manual specifications. Documentation of the manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

Monitoring and Recordkeeping Requirements

2.6 Planer Throughput

Each month, and for the most recent 12-month period, the permittee shall monitor and record the throughput of the planers. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

2.7 Pressure Drop Across Baghouse

The pressure drop across the shavings bin baghouse shall be monitored and recorded once weekly. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

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3. LUMBER-DRYING KILNS

Emission Limits

3.1 Stack Emission Limits

Emissions of PM₁₀ from the lumber-drying kiln stacks, vents, or other functionally equivalent opening shall not exceed any corresponding emission rate limit listed in the appendix of this permit.

Operating Requirements

3.2 Lumber-drying Kiln Throughput

The maximum throughput to the kilns shall not exceed 219 MMbf per any consecutive 12-month period.

Monitoring and Recordkeeping Requirements

3.3 Lumber-drying Kiln Operating Parameters

Each month, and each consecutive 12-month period, the permittee shall monitor and record the amount of lumber processed to demonstrate compliance with Permit Condition 3.2. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

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4. SAWMILL

Operating Requirements

4.1 Visible Emissions Limits at Property Boundary

Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by Method 22, as described in 40 CFR Part 60, Appendix A, or a Department-approved alternative method.

4.2 Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne, as required by 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.
- 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.

Monitoring and Recordkeeping Requirements

4.3 Reasonable Fugitive Control Measures Monitoring

The permittee shall monitor and record, during operations, the periodic method(s) used to reasonable control fugitive emissions as required by this permit. The records shall include the type of control used (e.g. water, environmentally safe chemical dust suppressants, etc.) as well as the circumstances under which no controls are used. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

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Reporting Requirements

4.4 Certification of Documents - IDAPA 58.01.01.123

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

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5. APPENDIX

Louisiana-Pacific Corp., Bonners Ferry, Idaho												
Emissions Limits ^a - Hourly (lb/hr) and Annual ^b (T/yr)												
Source Description	PM		PM ₁₀		SO ₂		NO _x		VOC		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boilers No. 1 and 2			0.91	3.98								
Planer shavings baghouse			1.29	5.63								
Lumber drying kilns			4.75	20.8						164		

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

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

lb/hr - pounds per hour

T/yr - tons per year

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6. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. 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 and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain 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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - 3.1 To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - 3.2 At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack emissions testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify the Department, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If emissions testing is specified, the permittee must schedule such testing within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup. Such testing must **strictly** adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from the Department. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.

The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by the Department, unless (1) the test demonstrates noncompliance; (2) a more restrictive operating limit is specified elsewhere in this permit; or (3) at such an operating rate, emissions would exceed any emissions limit(s) set forth in this permit.
7. 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.