



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor  
John H. Tippetts, Director

November 1, 2018

Patrick L. Malloy, President of Operations  
Idaho Veneer Company  
PO Box 339  
Post Falls, ID 83877

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

Dear Mr. Malloy:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2013.0064 Project 62121 to Idaho Veneer Company located at Post Falls for the PTC revision to decommission the Wellons hog-fuel boiler. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received September 25, 2018.

This permit is effective immediately and replaces PTC No. 2013.0064, issued on March 25, 2015. This permit does not release Idaho Veneer Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Air Quality Analyst, at (208) 666-4600 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Tom Burnham at (208) 373-0502 or [tom.burnham@deq.idaho.gov](mailto:tom.burnham@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

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

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\tb  
Permit No. P-2013.0064 Project 62121  
Enclosures

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** Idaho Veneer Company  
**Permit Number** P- 2013.0064  
**Project ID** 62121  
**Facility ID** 055-00004  
**Facility Location** 704 E 4<sup>th</sup> Street  
Post Falls, ID 83854

### Permit Authority

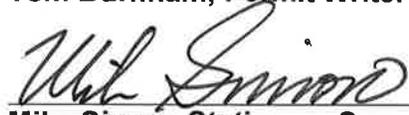
This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200-228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has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

**Date Issued** November 1, 2018



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Tom Burnham, Permit Writer



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Mike Simon, Stationary Source Manager

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# 1 Permit Scope

## Purpose

- 1.1 This is a revised permit to construct (PTC) to decommission the Wellons hog-fuel boiler.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2013.0064, issued on March 25, 2015.

## Regulated Sources

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

**Table 1.1 Regulated Sources**

Permit Section	Source	Control Equipment
3	<u>Cleaver Brooks Boiler</u> Manufacturer: Cleaver Brooks Rated capacity: 16.7 MMBtu/hr Production capacity: 13,333 lbs steam /hr Installed: 1971 Fuels: Natural gas	None
3	<u>Thermopack Boiler</u> Manufacturer: Thermopack Rated heat capacity: 600,000 Btu/hr Installed: 1980 Fuels: Natural gas	None
4	<u>Wellons Dry Kiln No. 1 and Coe Dry Kiln No. 2</u> Size rated: 1370 bdf/hr each	None
4	<u>Cremona Dryer</u> Rating: 10,000 sqft/hr (3/8" veneer) Steam Chambers (6)	None

[11/01/2018]

## 2 Facility-Wide Conditions

### Fugitive Emissions

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

### Odors

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

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

### **Visible Emissions**

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

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

### **Open Burning**

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

## **Reports and Certifications**

- 2.10** Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Coeur d' Alene Regional Office  
2110 Ironwood Parkway  
Coeur d' Alene, ID 83814  
Phone: (208) 769-1422  
Fax: (208) 769-1404

## **Obligation to Comply**

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

## **Fuel-burning Equipment**

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

### 3 Boilers

#### 3.1 Process Description

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

[11/01/2018]

#### 3.2 Control Device Descriptions

**Table 3.1 Boiler Descriptions**

Emissions Unit / Process	Emissions Control Device	Emissions Point
Cleaver Brooks Boiler	None	B2
Thermopack Boiler	None	B3

[11/01/2018]

### Emission Limits

#### 3.3 Emission Limits

The emissions from the Boilers stacks shall not exceed any corresponding emissions rate limits listed in Table 3.2.

**Table 3.2 Boilers Emission Limits <sup>(a)</sup>**

Source Description	PM <sub>10</sub> <sup>(b)</sup>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
Cleaver Brooks Boiler	0.04	0.16	0.003	0.01	0.48	2.10	0.40	1.76	0.026	0.12
Thermopack Boiler	0.01	0.023	0.001	0.002	0.05	0.3	0.05	0.25	0.003	0.02

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.

[11/01/2018]

### Operating Requirements

#### 3.4 Fuel Throughput Limits

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

[11/01/2018]

#### 3.5 Fuel Specification

The Cleaver Brooks and Thermopack boilers shall only combust natural gas or propane.

[11/01/2018]

### Monitoring and Recordkeeping Requirements

#### 3.6 Fuel Throughput Monitoring

The permittee shall monitor and record the amount of gas combusted to demonstrate compliance with Permit Condition 3.4. The annual amount shall be determined by combining the 12 most recent consecutive monthly amounts.

[11/01/2018]

## 4 Dry Kilns And Veneer Dryers

### 4.1 Process Description

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

### 4.2 Control Device Descriptions

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

**Table 4.1 Kilns, Dryer, And Steam Chambers**

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

## Emission Limits

### 4.3 Emission Limits

The PM<sub>10</sub> and VOC emissions from the dry kilns, steam chambers and veneer dryers stacks shall not exceed any corresponding emissions rate limits listed in Table 4.2.

**Table 4.2 Kilns, Dryer, And Steam Chambers Emissions Limits**

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

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

## Operating Requirements

### 4.4 Maximum Sawmill Lumber Throughput

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

### 4.5 Veneer Dryer Throughput Requirement

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

### 4.6 Maximum Facility Log Throughput

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

## Monitoring and Recordkeeping Requirements

### 4.7 Facility-wide Log Throughput Monitoring Requirement

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

**4.8 Veneer Throughput Monitoring Requirement**

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

**4.9 Lumber Throughput Monitoring Requirement**

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

## 5 Cyclones

### 5.1 Process Description

These emission units consist of cyclones controlling woodworking equipment throughout the facility.

[11/01/2018]

### 5.2 Control Device Descriptions

Table 5.1 Cyclone Description

Emissions Units / Processes	Control Devices	Emission Points
Planer Cyclone No. 1 and No. 2	NONE	P-38 & P-55
Sawdust Cyclone		P-39
Jointer Cyclone		P-13
Resaw Cyclone		P-14
Sawmill Chipper Cyclone		P-17
Veneer Chipper Cyclone		P-54

[11/01/2018]

## Emission Limits

### 5.3 Emission Limits

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

Table 5.2 COMBINED CYCLONE EMISSIONS LIMITS

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

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

## Operating Requirements

### 5.4 Cyclone Operation and Maintenance

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

## Monitoring and Recordkeeping Requirements

### 5.5 Opacity Monitoring Requirement

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

### 5.6 Throughput Monitoring Requirement

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

[11/01/2018]

## 6 General Provisions

### General Compliance

- 6.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)
- [Idaho Code §39-101, et seq.]
- 6.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
- [IDAPA 58.01.01.211, 5/1/94]
- 6.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.
- [IDAPA 58.01.01.212.01, 5/1/94]

### Inspection and Entry

- 6.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
  - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108]

### Construction and Operation Notification

- 6.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.
- [IDAPA 58.01.01.211.02, 5/1/94]
- 6.6 The permittee shall furnish DEQ written notifications as follows:
- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
  - A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and

- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

## **Performance Testing**

**6.7** If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

**6.8** All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

**6.9** Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

## **Monitoring and Recordkeeping**

**6.10** The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

## **Excess Emissions**

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

[IDAPA 58.01.01.130–136, 4/5/00]

## **Certification**

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

[IDAPA 58.01.01.123, 5/1/94]

## **False Statements**

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

[IDAPA 58.01.01.125, 3/23/98]

## **Tampering**

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

[IDAPA 58.01.01.126, 3/23/98]

## **Transferability**

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

[IDAPA 58.01.01.209.06, 4/11/06]

## **Severability**

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

[IDAPA 58.01.01.211, 5/1/94]