



September 8, 2016

VIA EMAIL

Larry Benda
Idaho Forest Group - Chilco
4447 E. Chilco Road
Athol, Idaho 83801

RE: Facility ID No. 055-00024, Idaho Forest Group (IFG), Chilco
Proposed Modified Permit to Construct for Public Comment

Dear Mr. Benda:

The Department of Environmental Quality (DEQ) has prepared a proposed Permit to Construct No.P-2013.0005 for IFG Chilco for the addition of a natural gas boiler and an increase of carbon monoxide limits on the hog fuel fired boiler. A public comment period is required, and DEQ is scheduling a 30-day public comment period in accordance with IDAPA 58.01.01.209.05.c. Rules for the Control of Air Pollution in Idaho. To find the exact dates and all other information concerning this public comment period please go to our website: <http://www.deq.idaho.gov>

Enclosed is proposed permit to construct for your review. You may submit comments during the public comment period if you so choose. Please email them to Anne.Drier@deq.idaho.gov or directly to me at daniel.pitman@deq.idaho.gov.

If you have any questions regarding the terms or conditions of the proposed permit, or about the public comment period, please contact me at (208) 373-0500.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Pitman".

Dan Pitman, P.E.
Permit Writer
Air Quality Division

Permit No. P-2013.0005 PROJ 61632

AIR QUALITY

PERMIT TO CONSTRUCT

Permittee Idaho Forest Group LLC - Chilco
Permit Number P-2013.0005
Project ID 61632
Facility ID 055-00024
Facility Location 4447 E. Chilco Road
Athol, Idaho 83801

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 Draft for Facility Review

Dan Pitman, P.E., Permit Writer

Mike Simon, Stationary Source Manager

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
BDT	Bone Dry Tons
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EFB	Electrified Filter Bed
ESP	Electrostatic Precipitator
ft ²	square feet
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
IFG	Idaho Forest Group
km	kilometer
lb	pound
lb/hr	pound per hour
Mbdft	thousand board feet
MMBtu/hr	million British thermal units per hour
NAAQS	National Ambient Air Quality Standards
NO _x	nitrogen oxides
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
PSD	Prevention of Significant Deterioration
SIC	Standard Industrial Classification
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This permit to construct (PTC) is a modification to the facility's existing PTC. Idaho Forest Group (IFG) proposes the following changes to its Chilco Sawmill:
- Change the CO emission limit on the hog fuel fired boiler.
 - Change the VOC limit on the lumber drying kilns.
 - Add a 95 MMBtu/hr natural gas fired boiler to the steam plant.
 - Replace the hog fuel fired boiler electrified filter bed (EFB) with an electrostatic precipitator (ESP).
- 1.2 This PTC replaces PTC No. P-2013.0005, issued May 10, 2013, the terms and conditions of which shall no longer apply.

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	<u>Hog Fuel Boiler</u> Manufacturer: Kipper & Sons, #1018 Rated Heat Input Capacity: 125 MMBtu/hr Burner Type: Spreader Stoker Rated Steam Capacity: 75,000 lb/hr	Multiclone Electrostatic Precipitator (ESP) Fine Dust Collector or Electrified Filter Bed (EFB)
4	<u>Natural Gas Fired Boiler</u> Manufacturer: John Zink Hamsworth Rated Input Capacity: 95 MMBtu/hr Rated Steam Capacity: 80,000 lb/hr	None
5	Kilns	None
6	Sawdust Bin Target Box	None
6	Sawmill Chip Bin Target Box	None
7	Planer Shavings Cyclone	Baghouse
7	Planer Chip Bin Target Box	None

2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) 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 monthly facility-wide inspection of potential sources of fugitive dust 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 dust 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 dust emissions, and the date the corrective action was taken.

[MAY 10, 2013]

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 in accordance with IDAPA 58.01.01.775-776.
- 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 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.

[MAY 10, 2013]

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, nitrogen oxides (NO_x), and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[MAY 10, 2013]

- 2.8 The permittee shall conduct a monthly 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.
- 2.8.1 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

[MAY 10, 2013]

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.10 The permittee shall comply with the "Rules for Control of Open Burning" (IDAPA 58.01.01.600–623).

Performance Testing

- 2.11.1 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.

- 2.11.2 All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Including the need to test at worst case normal operating conditions. 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

2.11.3 Unless a longer time is approved by DEQ, the permittee shall submit a compliance test report for the respective test to DEQ within 60 days. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol. The report shall also provide justification that the testing was done under worst case normal conditions.

[Draft]

2.11.4 The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the “Reports and Certifications” facility wide condition (Permit Condition 2.12).

[MAY 10, 2013]

Monitoring and Recordkeeping

2.12 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this 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.

Reports and Certifications

2.13 All reports and certifications required by this permit shall be submitted to DEQ. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

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

[MAY 10, 2013]

3. HOG FUEL BOILER

3.1 Process Description

The hog fuel boiler provides steam to heat the facility's dry kilns and the facility's production buildings. The hog fuel boiler is rated at 75,000 pounds steam per hour. See Table 1.1 for a more detailed description.

3.2 Emissions Control Description

Emissions resulting from the combustion of hog fuel in the hog fuel boiler are first routed to a high efficiency multiclone. After the multiclone, the uncollected fine dust and smoke particles are collected in an electrostatic precipitator (ESP) dust collector or an electrified filter bed (EFB). The cleaned air stream is vented through the boiler stack.

TABLE 3.1 HOG FUEL BOILER DESCRIPTION

Emissions Unit	Emissions Control Device	Emissions Point
Hog fuel boiler	Multiclone in series with ESP or EFB	Boiler stack

[Draft]

Emissions Limits

3.3 The PM₁₀, NO_x and CO emissions from the boiler stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

TABLE 3.2 BOILER STACK EMISSIONS LIMITS¹

Source Description	PM ₁₀ /PM _{2.5}		CO		NO _x
	lb/hr ²	T/yr ³	lb/hr ²	T/yr ³	lb/hr ²
Boiler stack	6.93	30.4	56.9	249.4	27.5

1 In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and record keeping requirements..

2 As determined by source test methods prescribed by IDAPA 58.01.01.157.

3. Tons per consecutive 12-calendar month period.

[Draft]

3.4 In accordance with IDAPA 58.01.01.210.12.d, formaldehyde emissions from the boiler stack shall not exceed 2.41 T/yr.

3.5 In accordance with IDAPA 58.01.01.676, PM emissions from the boiler stack shall not exceed 0.080 gr/dscf corrected to 8% oxygen when burning wood products.

3.6 The permittee shall comply with the visible emission requirements of Permit Condition 2.7.

Operating Requirements

3.7 Steam Production Limit

The steam production rate shall not exceed 607,594 thousand pounds of steam per any consecutive 12-month period.

[MAY 10, 2013]

3.8 Control Equipment Usage

A multiclone and ESP or a multiclone and EFB shall be used to control emissions from the hog fuel fired boiler.

[Draft]

Monitoring and Recordkeeping Requirements

3.9 Nitrogen Oxide Performance Tests

3.9.1 The permittee shall conduct a NO_x performance test within 180 days of issuance of this permit. All NO_x performance testing shall be conducted at worst case normal conditions but no less than 80% of the boiler's rated steam production rate unless written approval is received from DEQ.

[Draft]

3.9.2 The permittee shall conduct periodic performance tests to measure NO_x emissions from the hog fuel boiler to demonstrate compliance with the pound per hour NO_x emission limit in Table 3.2. The performance test shall be conducted in accordance with Permit Condition 2.11. The results of the performance test shall be expressed in terms of pounds per hour.

- The permittee shall monitor and record the steaming rate of the boiler at least once every 15 minutes during the performance test.
- The boiler shall operate at an average steaming rate greater than 60,000 pounds of steam per hour during the performance tests. If the average steaming rate is ≤60,000 pounds of steam per hour during the performance tests DEQ may impose a lower steaming rate limit on the boiler.

[Draft]

3.9.3 Periodic performance tests shall be conducted according to the following schedule:

- If the emissions measured during the most recent performance test are less than or equal to 75% of the respective emission limit, a subsequent performance test for that pollutant shall be conducted within five years of the test date.
- If the emissions measured during the most recent performance test are greater than 75%, but less than or equal to 90% of the respective emission limit, a subsequent performance test for that pollutant shall be conducted within two years of the test date.
- If the emissions measured during the most recent performance test are greater than 90% of the respective emission limit, a subsequent performance test for that pollutant shall be conducted within 13 months of the test date.

[Draft]

3.10 Carbon Monoxide Performance Tests

The permittee shall conduct carbon monoxide performance testing according to the requirements and schedule of 40 CFR 63.7510 and 40 CFR 63.7515. During each required test the permittee shall also determine the carbon monoxide emission rates in pounds per hour. All CO performance testing shall be conducted at worst case normal conditions but no less than 80% of the boilers rated steam production rate.

[Draft]

3.11 PM₁₀ Performance test

Within 180 days after startup of the boiler while equipped with an ESP the permittee shall conduct a PM₁₀ performance test. PM₁₀ performance testing shall be conducted at worst case normal conditions but no less than 80% of the boilers rated steam production rate.

3.12 Steam Production Monitoring

Each month, the permittee shall monitor and record the steam production rate that month in terms of 1000-pounds per month and 1000-pounds for the most recent consecutive 12-month period to demonstrate compliance with Permit Condition 3.7. This information shall be maintained in accordance with Permit Condition 2.12.

[MAY 10, 2013]

3.13 EFB Baghouse Monitoring

If the EFB system and associated media baghouse are still in use 180 days after issuance of this permit, then the permittee shall comply with the following requirements.

Within 180 days of issuance of this permit, the permittee shall have developed a Baghouse Procedures document for the inspection and operation of the baghouse system which controls emissions from the EFB filter media cleaning process. The Baghouse Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse Procedures document shall describe the procedures that will be followed to comply with General Provisions and shall contain requirements for weekly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at any time. At a minimum the document shall include:

- procedures to determine if bags are ruptured; and
- procedures to determine if bags are not appropriately secured in place.

The Permittee shall maintain records of the results of each baghouse system inspection in accordance with the General Provisions. The records shall include , but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

If required the Baghouse Procedures document shall be submitted to DEQ within 180 days of permit issuance for review and comment and shall contain a certification by a responsible official.

Any changes to the Baghouse Procedures document shall be submitted within 15 days of the change.

The Baghouse Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

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

[Draft]

40 CFR 63 Subpart DDDDD

3.14 The permittee shall comply with all applicable provisions of 40 CFR 63 Subpart DDDDD – National Emissions Standards for Hazardous Air Pollutants for Major Sources: Boilers.

[Draft]

4. NATURAL GAS FIRED BOILER

4.1 Process Description

The natural gas boiler provides steam to heat the facility's processes. The natural gas boiler is rated at 80,000 pounds steam per hour. The boiler has a rated input capacity of 95 MMBtu/hr. See Table 1.1 for a more detailed description.

[Draft]

4.2 Emission Controls

Emissions from the natural gas fired boiler are uncontrolled.

[Draft]

Emissions Limits

4.3 Emissions from the natural gas fired boiler stack shall not exceed any emission rate limits listed in Table 4.1.

TABLE 4.1 NATURAL GAS FIRED BOILER EMISSION LIMITS

Source	NO _x
	lb/hr ¹
Natural Gas Fired Boiler	5.1

1) As determined by source test methods prescribed by IDAPA 58.01.01.157.

[Draft]

Monitoring and Recordkeeping Requirements

4.4 Nitrogen Oxide Performance Tests

4.4.1 The permittee shall conduct a NO_x performance test within 180 days of issuance of this permit.

[Draft]

4.4.2 The permittee shall conduct periodic performance tests to measure NO_x emissions from the natural gas fired boiler to demonstrate compliance with the pound per hour NO_x limit in Table 4.1. The performance test shall be conducted in accordance with Permit Condition 2.11. The results of the performance test shall be expressed in terms of pounds per hour.

[Draft]

4.4.3 Periodic performance tests shall be conducted according to the following schedule:

- If the emissions measured during the most recent performance test are less than or equal to 75% of the respective emission limit, a subsequent performance test for that pollutant shall be conducted within five years of the test date.
- If the emissions measured during the most recent performance test are greater than 75%, but less than or equal to 90% of the respective emission limit, a subsequent performance test for that pollutant shall be conducted within two years of the test date.
- If the emissions measured during the most recent performance test are greater than 90% of the respective emission limit, a subsequent performance test for that pollutant shall be conducted within 13 months of the test date.

[Draft]

40 CFR 60 Subpart Dc & 40 CFR 63 Subpart DDDDD

- 4.5 The permittee shall comply with all applicable provisions of 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial Steam Generating Units and 40 CFR 63 Subpart DDDDD – National Emissions Standards for Hazardous Air Pollutants for Major Sources: Boilers.

[Draft]

5. DRY KILNS

5.1 Process Description

The dry kilns are used to dry green lumber. Lumber is dried by the steam produced by the facility's boilers. Vents on the dry kilns are opened and closed during batch drying cycles to control temperature and moisture within the kilns.

5.2 Emissions Control Description

Emissions from the dry kilns are uncontrolled.

TABLE 5.1 DRY KILNS DESCRIPTION

Emissions Unit(s)	Emissions Control Device	Emissions Point
Dry kilns	None	Dry kilns vents

Emissions Limits

5.3 Emissions from the dry kilns, inclusive, shall not exceed any corresponding emissions rate limits listed in Table 5.2.

TABLE 5.2 DRY KILNS EMISSIONS LIMITS

Source Description	PM ₁₀	VOC
	T/yr	T/yr
Dry Kiln Vents	17.88	238.5

[Draft]

5.4 The permittee shall comply with the visible emission requirements of Permit Condition 2.7.

Operating Requirements

5.5 Dry Kilns Maximum Throughput Limit

The maximum annual lumber produced from the dry kilns, inclusive, shall not exceed 325,000 Mbdft per any consecutive 12-month period.

Monitoring and Recordkeeping Requirements

5.6 Dry Kilns Throughput Monitoring

The permittee shall monitor and record the monthly and annual lumber production of each species of wood, or each group of wood species listed in the VOC Emissions Calculations section of this permit, from the dry kilns to demonstrate compliance with Permit Condition 5.5. Annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-month period. This information shall be maintained in accordance with Permit Condition 2.12.

[Draft]

5.7 VOC Emissions Calculations

Each month the permittee shall calculate the tons of VOC emissions from the drying kilns during the previous consecutive 12 month period to demonstrate compliance with the annual VOC emission limit for the kilns.

The permittee shall use the following VOC emissions factors (or factors approved by DEQ in writing):

Ponderosa Pine	2.46 lb/Mbdft
Douglas Fir	1.03 lb/Mbdft
Larch	0.25 lb/Mbdft
Hemlock	0.24 lb/Mbdft
Grand (white) Fir	0.70 lb/Mbdft
Hem Fir	0.70 lb/Mbdft
Lodgepole	1.32 lb/Mbdft
Spruce	0.11 lb/Mbdft
Engelmann Spruce/Lodgepole	1.32 lb/Mbdft
Alpine Fir	0.70 lb/Mbdft
Cedar	0.15 lb/Mbdft
Any other Type	2.46 lb/Mbdft

The permittee shall maintain records in accordance with the general provisions of this permit.

[Draft]

6. SAWMILL

6.1 Process Description

Logs are debarked and cut into dimensional lumber in the sawmill. As a result of these processes, wood scraps and sawdust are produced. The wood scraps are chipped in a chipper. The fine size material is screened and added to sawdust that is pneumatically conveyed to the sawdust bin target box located on the outdoor sawdust bin. Chips are pneumatically transferred to a sawmill chip bin target box on the outdoor sawmill chip bin.

6.2 Emissions Control Description

The sawmill building enclosure controls emissions generated from the sawing of logs and the chipping of wood scraps. Particulate matter emissions from the sawmill chip bin target box and sawdust bin target box are uncontrolled.

TABLE 6.1 SAWMILL MILL DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Sawmill chip bin target box	None	Sawmill chip bin target box vent
Sawdust bin target box	None	Sawdust bin target box vent

Emissions Limits

- 6.3 PM₁₀ emissions from the sawmill chip bin target box vent and sawdust bin target box vent shall not exceed any corresponding emissions rate limits listed in Table 6.2

TABLE 6.2 SAWMILL EMISSIONS LIMITS

Source Description	PM ₁₀ T/yr
Sawmill chip bin target box vent	6.27
Sawdust bin target box vent	2.65

- 6.4 The permittee shall comply with the visible emission requirements of Permit Condition 2.7.

Operating Requirements

6.5 Throughput Limit

The combined by-product throughput from the sawmill chip bin and the sawdust bin shall not exceed 356,906 BDT per any consecutive 12-month period.

Monitoring and Recordkeeping Requirements

6.6 Throughput Monitoring

The permittee shall monitor and record the by-product throughput to the sawmill chip bin and the sawdust bin monthly and annually to demonstrate compliance with Permit Condition 6.5. Annual throughput shall be determined by summing monthly throughput over the previous consecutive 12-month period. This information shall be maintained in accordance with Permit Condition 2.12.

6.7 Visible Emissions Monitoring

The permittee shall monitor and record visible emissions in accordance with Permit Condition 2.8

7. PLANER MILL

7.1 Process Description

The planer and associated equipment reduce dried or green lumber to a desired width and thickness. Planer shavings generated by the process are transported pneumatically from the planer building to a cyclone on the shavings bin. The cyclone separates out the shavings from the air stream and drops them into the planer shavings bin. Planer chips generated by the process are pneumatically transported to a planer chip bin target box on the planer chip bin.

[MAY 10, 2013]

7.2 Emissions Control Description

Emissions generated from the planer and associated equipment located inside the building are controlled by the building enclosure. Emissions resulting from the transport of planer shavings to the shavings bin are controlled by a baghouse on the planer shavings cyclone. Emissions resulting from the transport of planer chips to the planer chip bin target box are uncontrolled. Emissions from the planer shavings cyclone baghouse vent or the planer chip bin target box vent may be exhausted either back inside the building or outside the building.

TABLE 7.1 PLANER MILL DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Planer Shaving Cyclone	Fabric Filter Baghouse	Planer Shavings Cyclone Baghouse Vent
Planer Chip Bin Target Box	None	Planer Chip Bin Target Box Vent

[MAY 10, 2013]

Emissions Limits

- 7.3 When emissions from the planer shavings cyclone baghouse vent or the planer chip bin target box vent are exhausted outside the building, PM₁₀ emissions shall not exceed any corresponding emissions rate limits listed in Table 6.2.

TABLE 6.2 PLANER MILL EMISSIONS LIMITS

Source Description	PM ₁₀ T/yr
Planer Shavings Cyclone Baghouse Vent	5.4
Planer Chip Bin Target Box Vent	0.40

[MAY 10, 2013]

- 7.4 The permittee shall comply with the visible emission requirements of Permit Condition 2.7.

[MAY 10, 2013]

Operating Requirements

- 7.5 The planer shavings bin baghouse shall be installed, operated, and maintained in accordance with manufacturer recommendations. All manufacturer specifications, including baghouse pressure drop, operating parameters, and installation instructions, shall be kept onsite and shall be made available to DEQ representatives upon request.

[MAY 10, 2013]

- 7.6 The planer shavings bin baghouse shall be operated during operation of the planer and end trim saws. The pressure drop across the planer shavings baghouse shall remain within manufacturer specifications and recommendations.
[MAY 10, 2013]
- 7.7 When emissions from the planer chip bin target box vent are exhausted outside the building, the maximum annual throughput of by-product to the planer chip bin shall not exceed 16,000 BDT per any consecutive 12-month period. When emissions from the planer chip bin target box vent are exhausted inside the building, this throughput limit does not apply.
[MAY 10, 2013]
- 7.8 When emissions from the planer shavings cyclone baghouse vent are exhausted outside the building, the maximum annual throughput of by-product to the planer shavings bin shall not exceed 120,000 BDT per any consecutive 12-month period. When emissions from the planer shavings cyclone baghouse vent are exhausted inside the building, this throughput limit does not apply.
[MAY 10, 2013]

Monitoring and Recordkeeping Requirements

- 7.9 Each month, the permittee shall monitor and record the total BDT throughput of by-product fed to the planer chip bin during periods when emissions from the planer chip bin target box vent are exhausted outside the building. During months that no emissions from the planer chip bin target box vent are exhausted outside the building, the recorded throughput for that month would be zero. The throughput shall be recorded for that month and for the most recent 12-month period.
[MAY 10, 2013]
- 7.10 Each month, the permittee shall monitor and record the total BDT throughput of by-product fed to the planer shavings bin during periods when emissions from the planer shavings bin baghouse vent are exhausted outside the building. During months that no emissions from the planer shavings bin baghouse are exhausted outside the building, the recorded throughput for that month would be zero. The throughput shall be recorded for that month and for the most recent 12-month period
[MAY 10, 2013]
- 7.11 The permittee shall monitor and record the pressure drop across the planer shavings baghouse weekly.
[MAY 10, 2013]
- 7.12 The permittee shall monitor and record visible emissions in accordance with Permit Condition 2.8.
[MAY 10, 2013]

8. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

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

[Idaho Code §39-101, et seq.]

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

[IDAPA 58.01.01.211, 5/1/94]

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

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

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

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

[Idaho Code §39-108]

Construction and Operation Notification

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

[IDAPA 58.01.01.211.02, 5/1/94]

8.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

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

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

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

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

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

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

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

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

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

[IDAPA 58.01.01.123, 5/1/94]

False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

Transferability

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

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

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

[IDAPA 58.01.01.211, 5/1/94]