



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 N Hilton Street, Boise, ID 83706  
(208) 373-0502

Brad Little, Governor  
Jess Byrne, Director

July 21, 2021

Tom Laud, Plant Manager  
Stimson Lumber Company St. Maries  
520 SW Yamhill Street  
Portland, OR 97204

RE: Facility ID No. 009-00004, Stimson Lumber Company, St. Maries  
Final Permit Letter

Dear Mr. Laud:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2009.0070 Project 62561 to Stimson Lumber Company located at St. Maries for the replacement of one kiln and increase plant throughput. 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 January 14, 2021.

This permit is effective immediately and replaces PTC No. P-2009.0070 issued on August 31, 2012. This permit does not release Stimson Lumber Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Coeur d'Alene Regional Office, 2110 Ironwood Pkwy., Coeur d'Alene, ID 83814, Fax (208) 769-1404.

In order to fully understand the compliance requirements of this permit, as requested, Almer Casile, Air Quality Analyst, at (208) 769-1422, will schedule a permit handoff meeting to review and discuss the terms and conditions of this permit. Please note that this meeting should be scheduled once the permitted emissions units are operating and some representative records required by the permit have been generated by the facility. 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

Mr. Laud  
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contested case, I encourage you to contact Kelli Wetzel at (208) 373-0502 or [kelli.wetzel@deq.idaho.gov](mailto:kelli.wetzel@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script that reads "Darin Parpian".

for, Mike Simon  
Stationary Source Bureau Chief  
Air Quality Division

MS\kw

Permit No. P-2009.0070 PROJ 62561

Enclosures

# Air Quality

## PERMIT TO CONSTRUCT

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**Permittee** Stimson Lumber Company St. Maries  
**Permit Number** P-2009.0070  
**Project ID** 62561  
**Facility ID** 009-00004  
**Facility Location** 500 Milltown Road  
St. Maries, ID 83861

### 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** July 21, 2021



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**Kelli Wetzel, Permit Writer**



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**for, Mike Simon, Stationary Source Bureau Chief**

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# 1 Permit Scope

## Purpose

- 1.1 This is a modified permit to construct (PTC) to replace Kiln #4 with a new kiln (Kiln #6) and increase the allowable production rate of the kilns to 110 MMBF/yr.
- 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-2009.0070 issued on August 31, 2012.

## 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>Wellons Boiler:</u> Manufacturer: Wellons Max production: 35,000 lb/hr steam Manufacture Date: 1987 Max. capacity: 40,000 lb/hr steam Fuel: hog fuel	<u>Dry Electrostatic Precipitator:</u> Manufacturer: PPC Industries Model: 11R-1220-2612 Type: Dry Number of plates: 24 Plate spacing: 11.5 in Number of electrodes: 32 Plate cleaning: Rapping Blower: Forced, 60 hp PM <sub>10</sub> control efficiency: 99.8%
4	<u>Planer:</u> Manufacturer: Stimson Lumber Max production: 110 MMBF/yr Manufacture Date: Prior to 1998	<u>Baghouse:</u> Manufacturer: Clarke Street Metal Model: 6020 Type: Pneuair filter Number of bags: 60 Type of bag: 16 oz polyester Size: 20 at 11.5' x 20', 20 at 16' x 20', 20 at 20' x 20' Air to cloth: 4.17 to 1 PM <sub>10</sub> control efficiency: 99.9%
5	<u>Drying Kilns 3,5,6</u> Manufacturer: Stimson Lumber Max production: 110 MMBF/yr	None

[7/21/2021]

## **2 Facility-Wide Conditions**

### **2.1 Opacity Limit**

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

### **2.2 Reasonable Control of Fugitive Emissions**

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne as required in IDAPA 58.01.01.651. 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 PM. 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.

### **2.3 Fugitive Dust Monitoring**

Beginning July 1, 2010, each quarter the permittee shall conduct a 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 emission inspection. The records shall, at a minimum, include 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.

### **2.4 Visible Emissions/Opacity Monitoring**

Each month the permittee shall conduct a site-wide inspection of potential sources of visible emissions; including any stack, vent, or other functionally equivalent opening; during daylight hours and under normal operating conditions, to demonstrate compliance with the opacity Permit Condition. The inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%

for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee’s assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken. All records shall be maintained on-site for a period of 5 years and shall be made available to DEQ representatives upon request.

[5/21/2010]

**2.5 Facility-Wide HAP Emission Limits**

Facility-wide emissions shall not equal or exceed any emission rate limits listed in Table 2.1.

**Table 2.1 Facility-Wide Emission Limits <sup>(a)</sup>**

Source Description	Individual HAP <sup>(b)</sup>	Total HAP <sup>(c)</sup>
	T/yr <sup>(d)</sup>	T/yr <sup>(d)</sup>
Facility-wide emissions (total emissions from all sources combined)	9.9	24.8

- a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and recordkeeping requirements.
- b) Emission limit for each hazardous air pollutant (HAP). Individual HAP include, but are not limited to, emissions of methanol, formaldehyde, acetaldehyde, propionaldehyde, and acrolein.
- c) Emission limit for the total of all HAP (combined).
- d) Tons per any consecutive 12-calendar-month period

[7/21/2021]

**2.6 Facility-Wide Emissions Limits Compliance Monitoring**

Each month, the permittee shall calculate the tons of each individual HAP and tons of total HAP emissions from all emission sources in tons per calendar month (T/mo) and in tons per consecutive 12-month period (T/yr), determined by summing the monthly emissions from these sources over the previous consecutive 12-month period.

- Emissions from the kilns shall be assessed using kiln production monitoring data, maximum entering-air temperature data, and approved HAP kiln emission factors for each relevant species dried as specified in kiln Monitoring and Recordkeeping.
- Emissions from the boiler shall be assessed using Boiler Steam Monitoring data and emission factors established from Boiler Performance Testing data.

[7/21/2021]

**2.7 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. Documents include, but are not limited to:

- National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[7/21/2021]



### 3 Wellons Boiler

#### 3.1 Process Description

The Wellons Boiler is a wood-residual fired boiler with a capacity of 40,000 lb steam/hr. This permit limits operational capacity to 35,000 lb steam/hr. The steam is used to dry green lumber in three drying kilns.

#### 3.2 Control Device Descriptions

**Table 3.1 Wellons Boiler Description**

Emissions Units / Processes	Control Devices
Wellons Boiler	PPC Electrostatic Precipitator (ESP)

[5/21/2010]

### Emission Limits

#### 3.3 Emission Limits

The emissions from the Wellons Boiler stack shall not exceed any corresponding emissions rate limits listed in Table 3.2. Particulate matter emissions from the Wellons Boiler stack shall not exceed 0.080 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 8% oxygen by volume.

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

Source Description	PM <sub>10</sub> <sup>(b)</sup>		PM		CO	
	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>
Wellons Boiler	10.00	44.00	10.00	44.00	30.00	97.00

- 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.

[5/21/2010]

### Operating Requirements

#### 3.4 Maximum Production Rate

The Wellons Boiler's maximum steam production rate shall not exceed 35,000 lb steam/hr averaged over a rolling, consecutive three hour period.

#### 3.5 Electrostatic Precipitator (ESP)

The permittee shall install and operate an electrostatic precipitator to control emissions from the Wellons Boiler in accordance with manufacturer recommendations.

[5/21/2010]

#### 3.6 ESP Operation Parameters

The secondary voltage and amperage applied to each transformer-rectifier set shall be maintained as follows:

- Secondary Amperage Minimum – Greater than zero milliamps
- Secondary Voltage Minimum – 25 kilovolts (average of the first and second fields)

The minimum secondary voltage must not be below 25 kilovolts for any 24 hour averaging period.

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

[5/21/2010]

### **3.7 40 CFR 63 Subpart JJJJJJ – Tune-Ups**

In accordance with 40 CFR 63.11223 (b) you must conduct a tune-up of the boilers biennially as specified in the following. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

- As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- Maintain on-site and submit, if requested, a report containing the following information:
  - The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
  - A description of any corrective actions taken as a part of the tune-up of the boiler.

- The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period.
- If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

[7/21/2021]

### **3.8 40 CFR 63 Subpart JJJJJJ – Air Pollution Control Practices**

In accordance with 40 CFR 63.11205(a) at all times the permittee must operate and maintain any affected boiler, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by 40 CFR 63 Subpart JJJJJJ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[7/21/2021]

## **Monitoring and Recordkeeping Requirements**

### **3.9 Wellons Boiler Steam Production Monitor**

The permittee shall calibrate, maintain and operate, in accordance with manufacturer specifications, a device that continuously monitors the steam production rate of the Wellons Boiler.

### **3.10 Steam Production Monitoring and Recording**

The permittee shall continuously monitor the steam production rate.

The following information shall be recorded and maintained onsite:

- Steam production rate of Wellons Boiler, in pounds per hour (lb/hr). The lb/hr steam rate shall be recorded once every hour.
- Average lb/hr steam production rate, as determined using a rolling, consecutive three hour steam production averaging period. The average lb/hr steam production rate, based on a rolling, consecutive, three hour averaging period, shall be calculated and recorded each hour.

To ensure compliance with the annual emission limits, the permittee shall record and maintain the following:

- The summation of the hourly steam rate of the Wellons Boiler shall be determined in Tons per Month (T/Mo) and shall be recorded.
- Each monthly total shall be summed together for each consecutive 12-month period to obtain annual steam production rate in Tons per year (T/yr).

As an alternative, steam production may be measured and recorded using a steam totalizer. Should this option be utilized; operation, calibration and maintenance of the totalizer must be performed in accordance with manufacturer specifications. Additionally, hourly measurements are not required except when the totalizer is not functioning. Steaming rates of the three-hour average (lb/hr), monthly (T/mo) and annual (T/yr) shall be measured and recorded.

[5/21/2010]

### **3.11 ESP Monitoring Requirements**

Within 60 days of permit issuance, the permittee shall install, calibrate, operate and maintain any equipment necessary to monitor the following:

- secondary voltage
- secondary amperage

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

[5/21/2010]

### **3.12 ESP Performance**

At least once each calendar year, the permittee shall inspect the ESP for physical degradation that could affect the performance of the ESP. At a minimum, the permittee shall check the following components of the ESP for damage or other condition that would reduce the efficiency:

- Discharge electrodes
- Collection electrodes
- Electrode alignment
- Rapper mechanisms for the electrodes
- Transformer-rectifier sets

The permittee shall record in a log (an electronic log is acceptable) the results of the inspection. The log shall contain the date of inspection, the identity of the inspector, the results of each inspection, and the date of any repairs made or corrective action taken.

[5/21/2010]

### **3.13 40 CFR 63 Subpart JJJJJJ – Notifications and Reports**

In accordance with 40 CFR 63.11225(c)(1) and in accordance with 40 CFR 63.10(b)(2)(xiv), the Permittee must keep a copy of each notification and report that was submitted to comply with 40 CFR 63 Subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.

[7/21/2021]

### **3.14 40 CFR 63 Subpart JJJJJJ – Tune-Up Records**

In accordance with 40 CFR 63.11225(c)(2) the Permittee must keep records to document that tune-ups of the boilers have been conducted biennially. In accordance with 40 CFR 63.1125(c)(2) records shall include:

- Identification of each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned - 40 CFR 63.1125(c)(2)(i).
- Copies of the energy assessments conducted on each boiler - 40 CFR 63.1125(c)(2)(iii).

[7/21/2021]

**3.15 40 CFR 63 Subpart JJJJJJ – Malfunction Records**

In accordance with 40 CFR 63.11225(c)(4) the Permittee must keep records of the occurrence and duration of each malfunction of the boilers, or of the associated air pollution control and monitoring equipment.

[7/21/2021]

**3.16 40 CFR 63 Subpart JJJJJJ – Minimize Emission Records**

In accordance with 40 CFR 63.11225(c)(5) the Permittee must keep records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

[7/21/2021]

**3.17 40 CFR 63 Subpart JJJJJJ – Recordkeeping Form**

In accordance with 40 CFR 63.11225(d) records must be in a form suitable and readily available for expeditious review. The Permittee must keep each record for 5 years following the date of each recorded action. The Permittee must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The Permittee may keep the records off site for the remaining 3 years.

[7/21/2021]

**3.18 40 CFR 63 Subpart JJJJJJ – Fuel Switch**

In accordance with 40 CFR 63.1125(f) & (g) if the Permittee intends to commence combustion of solid waste, switch fuels or make a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within 40 CFR 63 Subpart JJJJJJ the Permittee shall comply with all applicable notification, reporting, and recordkeeping requirements.

[7/21/2021]

**Performance Testing Requirements**

**3.19 Performance Test**

The permittee conducted a compliance test on October 7, 2009. This test is considered the initial test for the facility, and demonstrates compliance with the opacity, PM, PM<sub>10</sub>, and CO emissions limits of the Wellons Boiler. All subsequent tests shall also include those pollutants stated above as well as monitoring and recording the streaming rate of the boiler. An EPA reference test Method or Department approved alternative shall be implemented for all subsequent tests.

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

The permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. 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 proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent 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

The permittee is encouraged to submit a performance testing protocol for approval 30 days prior to conducting the performance tests.

The emission rate measured in the compliance test conducted November 13, 2019 was less than 75% of the emission limit in Table 3.2. The next test shall be conducted within 5 years of November 13, 2019. All subsequent Performance Tests shall base the required frequency on the table below.

**Table 3.3 Tiered Test Frequency**

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

[7/21/2021]

## Reporting Requirements

### 3.20 Reporting Requirement

All reporting related to future performance tests shall meet all requirements of the Performance Testing General Provision.

[5/21/2010]

### 3.21 40 CFR 63 Subpart JJJJJJ - Reporting

In accordance with 40 CFR 63.11225(b) the permittee must prepare biennially, and submit upon request, a compliance certification report containing:

- The Company name and address, and
- A statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and

other requirements of 40 CFR 63 Subpart JJJJJ. Your notification must include the following certifications of compliance: this facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial tune-up of each boiler; and no secondary materials that are solid waste were combusted in any affected unit.

[7/21/2021]

### **3.22 Reporting Requirement**

All reporting related to future performance tests shall meet all requirements of the Performance Testing General Provision.

[5/21/2010]

## 4 Drying Kilns 3, 5, and 6

### 4.1 Process Description

The steam-drying kilns are used to dry green lumber in 18-40 hour batch drying cycles.

### 4.2 Control Device Descriptions

Table 4.1 Drying Kilns 3, 5, and 6 Description

Emissions Units / Processes	Control Devices
Drying Kilns 3, 5, and 6	None

[7/21/2021]

## Emission Limits

### 4.3 Kiln Emission Limits

Emissions from the three lumber drying kiln stacks shall not exceed any emissions rate limit listed in the table below.

Table 4.2 Drying Kilns 3, 5, and 6 Emission Limits<sup>(a)</sup>

Source Description	PM <sub>2.5</sub> /PM <sub>10</sub> <sup>(b)</sup>		VOC	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
Drying Kilns 3, 5, and 6	0.39	1.71	12.46	54.6

- Limits for the kilns are for the total emissions from all vents associated with each kiln. In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter (PM) including condensable PM as defined in IDAPA 58.01.01.006, with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers for PM<sub>2.5</sub>, and less than or equal to a nominal 10 micrometers for PM<sub>10</sub>.
- Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, or continuous emission monitoring system (CEMS) data.
- Tons per any consecutive 12-calendar-month period.

[7/21/2021]

## Operating Requirements

### 4.4 Combined Kiln Throughput Limit

The maximum combined throughput to the three drying kilns shall not exceed 110 million board feet per any consecutive 12-month period (MMBF/yr).

[7/21/2021]

### 4.5 Kiln 6 Throughput Limit

The maximum throughput of Western Hemlock to Kiln 6 shall not exceed 168,600 board feet per any consecutive 24-hour period (BF/day).

[7/21/2021]

## Monitoring and Recordkeeping Requirements

### 4.6 Kiln Production and Temperature Monitoring

For each dry kiln charge, the permittee shall monitor and record the following:

- Starting and ending date/time of drying;
- All species of wood contained in the kiln charge;



- The total quantity of lumber present in the kiln charge, in units of million board-feet (MMbf); and
- The maximum entering-air temperature for the schedule used to dry the kiln charge, in units of degrees Fahrenheit (°F).

Each month, the permittee shall monitor and record the following kiln production information in units of million board-feet per month (MMbf/mo) and in million board-feet per consecutive 12-month period (MMbf/yr), determined by summing each monthly production over the previous consecutive 12-month period.

- The quantity of each species of wood processed in all of the kilns; and
- The total sum of all wood species processed in all of the kilns.

Monthly production totals for each species shall be used for assessing VOC and HAP emissions from the kiln as specified in the Kilns and Wellons Boiler Emissions Limits Compliance Monitoring condition. Monthly production totals for all species combined shall be used to determine compliance with the Kiln Production Limit.

Each day that Western Hemlock is processed in Kiln 6, the permittee shall monitor and record the quantity of Western Hemlock in units of board-feet to determine compliance with the Kiln 6 Throughput Limit.

[7/21/2021]

#### **4.7 Kiln O&M Manual**

Within 120 days after permit issuance, the permittee shall develop and submit to DEQ a Kiln Operation and Maintenance (O&M) manual for review and comment at the address provided in the Notification Address permit condition. Any changes to the O&M manual shall be submitted to DEQ for review and comment within 15 days of the change.

The O&M manual shall describe procedures that will be followed to ensure compliance with the Kiln Emission Limits and the Kiln Production Limit; accurate measurement of kiln entering-air, wet bulb, and dry bulb temperatures; and kiln manufacturer's specifications and recommendations. The O&M manual shall be a permittee-developed document based upon, but independent from, the manufacturer-supplied operating manuals. The O&M Manual shall at a minimum contain the following:

- Procedures for installation, calibration, and maintenance of kiln temperature controllers and sensors in accordance with manufacturer's instructions.
- Procedures and frequency of calibration checks for kiln temperature sensors. Calibration checks for entering-air temperature sensors shall be completed at least once every six months.
- Procedures and frequency for auditing and updating maximum entering-air temperature determinations for each kiln drying schedule as specified in the Kiln Drying Schedules and Maximum Entering-Air Temperature Determinations permit condition. At least once every six months or more frequently when appropriate (e.g., such as when drying schedule parameters are changed), each drying schedule maximum entering-air temperature determination shall be audited by comparing the control chart from the most recent charge processed using that schedule to the control chart used in determining the maximum entering-air temperature for that schedule. The maximum entering-air temperature for the most recent charge processed shall be determined using one of the specified methods, and if this maximum temperature exceeds the previously-determined maximum temperature for that drying schedule, then the most recent maximum

temperature shall be used in assessing emissions from the kilns beginning from the starting time that the charge was processed. If schedule parameters are changed, or a new schedule is created, the maximum entering-air temperature shall be established initially using one of the specified methods for the first charge processed using the new parameters, and subsequently audited every six months as described above.

- The permittee shall operate the kilns in accordance with the O&M manual. The procedures specified in the O&M manual are incorporated by reference into this permit and are enforceable permit conditions. The O&M manual and copies of any manufacturer's manual(s) and recommendations shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[7/21/2021]

#### **4.8 Kiln Drying Schedules and Maximum Entering Air Temperature Determinations**

The permittee shall maintain records onsite of at least two example control charts ("pen charts") for each drying schedule used over the most recent five-year period, and copies of all control charts used in Kiln O&M Manual audits completed over the most recent five-year period. For the purposes of assessing actual kiln emissions for Kilns and Wellons Boiler Emissions Limits Compliance Monitoring, the maximum entering-air temperature ("Enter Air") determined from at least two example control charts shall be used.

The maximum entering-air temperature for each schedule shall be determined as either the highest instantaneous temperature, or the highest 60-minute average temperature, exhibited in the two or more example control charts evaluated (i.e., the highest maximum exhibited).

At a minimum, the applicable information required in the Kiln Production and Temperature Monitoring permit condition shall be identified or recorded on each example control chart evaluated.

[7/21/2021]

#### **4.9 Kiln VOC and HAP Emissions Tracking**

Each month, the permittee shall calculate the tons of VOC and HAP emissions from the kilns during the previous consecutive 12-month period to demonstrate compliance with the Kiln Emissions Limits and the Facility-Wide HAP Emission Limits.

- VOC and HAP emissions from all of the kilns shall be calculated using Kiln Production and Temperature Monitoring data and the emission factors in Table 4.3.
- The value "X" in the emission factor equation is the "maximum entering-air temperature" in degrees Fahrenheit as determined using the procedures in the Kiln Drying Schedules and Maximum Entering-Air Temperature Determinations permit condition. When tracking a multiple-species charge, the permittee shall use the highest emission factor of all of the wood species in the charge. Any emissions from a charge calculated at less than zero shall be set equal to zero (negative emissions of acrolein HAP are possible at lower temperatures).
- VOC and HAP emission factors are developed using the maximum entering-air temperature and Table 4.3 following the example below for drying Douglas fir at 220 °F:  
$$\text{VOC emission factor} = 0.01460 \times (220) - 1.77130 = 1.4407 \text{ lb/mbf}$$
- Monthly kiln VOC and HAP emissions shall be calculated using the quantity and species for each kiln charge and the VOC and HAP emission factors calculated based on the maximum entering-air temperature for that kiln charge.

- Annual kiln VOC and HAP emissions are calculated by summing each monthly VOC emissions over the previous consecutive 12-month period.

**Table 4.3 Lumber Drying Kiln VOC and HAP Emission Factors**

Species	VOC lb/mbf <sup>(a)</sup>	Methanol HAP lb/mbf <sup>(a)</sup>	Formaldehyde HAP lb/mbf <sup>(a)</sup>	Acetaldehyde HAP lb/mbf <sup>(a)</sup>	Propionaldehyde HAP lb/mbf <sup>(a)</sup>	Acrolein HAP lb/mbf <sup>(a)</sup>
Species: Non-Resinous Softwood						
Western True Fir <sup>(b)</sup>	0.00817(X)-1.02133	0.00465(X)-0.73360	0.00016(X)-0.02764	0.0550	0	0.0012
Western Hemlock	0.00369(X)-0.39197	0.00249(X)-0.39750	0.000046(X)-0.007622	0.0677	0.0004	0.0012
Western Red Cedar <sup>(c)</sup>	0.00817(X)-1.02133	0.00465(X)-0.73360	0.00016(X)-0.02764	0.0677	0.0004	0.0012
Species: Resinous Softwood (Non-Pine Family)						
Douglas Fir	0.01460(X)-1.77130	0.00114(X)-0.16090	0.000028(X)-0.00380	0.0275	0.0003	0.0005
Engelmann Spruce	0.1769	0.00088(X)-0.13526	0.000042(X)-0.006529	0.0201	0.0002	0.0005
Larch	0.01460(X)-1.77130	0.00114(X)-0.16090	0.000028(X)-0.00380	0.0275	0.0003	0.0005
Species: Resinous Softwood (Pine Family)						
Lodgepole Pine	1.1352	0.0550	0.0030	0.0104	0.0003	0.0008
Ponderosa Pine	0.02083(X)-1.30029	0.00137(X)-0.18979	0.000074(X)-0.010457	0.034	0.0010	0.0026
Western White Pine	0.02083(X)-1.30029	0.00137(X)-0.18979	0.000074(X)-0.010457	0.034	0.0010	0.0026
Species: Other Species Not Listed						
Other Species Not Listed <sup>(d)</sup>	0.02083(X)-1.30029	0.00465(X)-0.73360	0.00016(X)-0.02764	0.0677	0.0010	0.0026

a) Pounds per thousand board feet (lb/mbf).

b) Western true firs consist of the following seven species classified in the same *Abies* genus: bristlecone fir, California red fir, grand fir, noble fir, pacific silver fir, subalpine fir and white fir.

c) Includes western red cedar and any other cedar species.

d) If a species dried is not listed in this table, or the lumber processed includes an indeterminate mixture or variety of species, the emission factors for "Other Species Not Listed" species shall be used when assessing emissions.

[7/21/2021]

## 5 Wood Residuals Transfer and Planer Shavings

### 5.1 Process Description

There are three cyclones (planer shavings, planer chipper, and small planer shavings) used to control the transfer of wood residuals to the boiler or load-out.

### 5.2 Control Device Descriptions

**Table 5.1 Baghouse Description**

Emissions Units / Processes	Control Devices
Small Planer, Planer Shavings & Planer Chipper Cyclones	Baghouse, or equivalent, with PM <sub>10</sub> control efficiency of 99.9%

[8/31/2012]

## Emission Limits

### 5.3 Emission Limits

The emissions from the small planer, planer shavings, and planer chipper cyclones' baghouse stack shall not exceed any corresponding emissions rate limits listed in Table 5.2.

**Table 5.2 Planer Shavings Emission Limits<sup>(a)</sup>**

Source Description	PM <sub>2.5</sub> <sup>(b)</sup>
	T/yr <sup>(d)</sup>
Small Planer, Planer Shavings & Planer Chipper Cyclones <sup>(c)</sup> Baghouse	0.014

- In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal two point five (2.5), including condensable particulate as defined in IDAPA 58.01.01.006
- 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.
- Tons per any consecutive 12-calendar month period.

[8/31/2012]

## Operating Requirements

### 5.4 Control Equipment

The permittee shall install and operate a 99.9% efficient baghouse, or equivalent, to control PM and PM<sub>10</sub> emissions from the Small Planer Cyclone, Planer Shavings Cyclone and the Planer Chipper Cyclones.

[8/31/2012]

### 5.5 Baghouse Procedures

The permittee shall maintain a Baghouse/Filter System Procedures document for the inspection and operation of the baghouses/Filter system which controls emissions from the Small Planer, Planer Shavings and Planer Chipper Cyclones. The Baghouse/Filter System 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/Filter System Procedures document shall describe the procedures that will be followed to comply with the second General Provision and shall contain requirements for monthly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

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

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

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

If the plan needs to be changed to incorporate requirements for the Planer Chipper Cyclone into the plan, the Permittee shall submit the revised plan within 60 days after issuance of this permit. Submittal of this particular change to the plan is not required within 15 days.

The Baghouse/Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request. The operating and monitoring requirements specified in the Baghouse/Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

The Procedures document shall be sent to the Coeur d'Alene Regional Office for review at 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

[8/31/2012]

## **Monitoring and Recordkeeping Requirements**

### **5.6 Baghouse System Monitoring**

The permittee shall maintain records of the results of each baghouse system inspection in accordance with monitoring and recordkeeping General Provision in order to demonstrate compliance with the emission limits of this section. The records shall also include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken to demonstrate compliance with IDAPA 58.01.01.625. The visible emissions records shall be compiled each time the monthly see/no see inspection is conducted.

[5/21/2010]

## 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, 5/1/1994]

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, 5/1/1994]

### 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, 5/1/1994]

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, 5/1/1994]

- 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, 5/1/1994]

## 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, 4/5/2000 and 4/11/2015]

## 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, 5/1/1994]

## **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, 4/5/2000]

## **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, 5/1/1994]

## **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, 3/23/1998]

## **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, 3/23/1998]

## **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, 4/11/2006]

## **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, 5/1/1994]