STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
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C.L. "Butch" Otter, Governor
John H. Tippets, Director

September 20, 2016

Steve Linton, President
Tri-Pro Forest Products, Inc.
1122 Highway 2
Oldtown, Idaho 83822

RE: Facility ID No. 017-00006, Tri-Pro Forest Products, Inc., Oldtown
Final Permit Letter

Dear Mr. Linton:

The Department of Environmental Quality (DEQ) is issuing initial facility-wide Permit to Construct (PTC) No. P-2016.0009 Project 61680 to Tri-Pro Forest Products, Inc. located at Oldtown. 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 March 22, 2016.

This permit is effective immediately and replaces Tier II Operating Permit No. T2-050126, issued on May 24, 2006. This permit does not release Tri-Pro Forest Products, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Air Quality Science Office, Coeur d'Alene Regional Office, at (208) 769-1422 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

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

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

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Permit No. P-2016.0009 PROJ 61680

Enclosures

Printed on Recycled Paper

Air Quality

PERMIT TO CONSTRUCT

Permittee	Tri-Pro Forest Products, Inc.
Permit Number	P-2016.0009
Project ID	61680
Facility ID	017-00006
Facility Location	1122 Highway 2 Oldtown, Idaho 83822

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 September 20, 2016

Bill Rogers

Bill Rogers, Permit Writer

Mike Simon

Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is the initial permit to construct (PTC) for an existing lumber mill that processes cedar primarily. This permitting action converts an expired Tier II operating permit to a stand-alone PTC and changes the name of the facility from Tri-Pro Cedar Products to Tri-Pro Forest Products, Inc.

1.2 This PTC replaces Tier II Operating Permit No. T2-050126, issued on May 24, 2006.

Regulated Sources

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

Table 0.1 Regulated Sources

Permit Section	Source	Control Equipment
2	**Sawmill Mill** Max Annual Throughput: 90 million board feet green lumber	Cyclone 12 stack exhaust
2	**Planer Mill – Buildings 1, 2, and 3** Max Annual Throughput: 90 million board feet dried lumber	**Shavings Truck Bin #1** Cyclone 2 stack exhaust Cyclone 7 stack exhaust **Chip Truck Bin** Cyclone 6 stack exhaust **Shavings Truck Bin #2** Cyclone 4 stack exhaust
2	**Lumber Dry Kilns (10 Total)** Design Capacity: 90 million board feet dried lumber	Kiln roof vents

2 Facility-wide Conditions

Fugitive Emissions

2.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operation to human habitations and/or activities and atmospheric condition that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operation, the grading of roads, or the clearing of lands;
- Application, where practical, of asphalt, water or suitable chemical 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; or
- Prompt removal of earth or other stored material from streets, where practical.

2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e. water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after a valid complaint is received. 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 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 corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee' assessment of the condition existing at the time fugitive emissions were present (if observed); any corrective action taken in response to the fugitive emissions; and the date the corrective action was taken.

Odors

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

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

Visible Emissions

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

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. The visible emissions 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 emissions, 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 its annual compliance certification in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test, and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed); any corrective action taken in response to the visible emissions; and the date corrective action was taken.

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 requirements of IDAPA 58.01.01.600-616, Rules for the Control of Open Burning.

Air Stagnation Advisory Days

2.11 The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.500-562.

Monitoring and Recordkeeping

2.12 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and condition of this permit. Recording of monitoring information shall include, but not be limited to: (a) the date, place, and times of sampling and 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 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to:

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

Obligation to Comply

2.14 Receiving a PTC shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

Fuel-burning Equipment

2.15 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas.

Sulfur Content

2.16 The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil – 0.3% by weight
- ASTM Grade 2 fuel oil – 0.5% by weight

2.17 The permittee shall maintain documentation of supplier verification of distillate fuel oil content on an as-received basis.

Renovation/Demolition

2.18 The permittee shall comply with all applicable portion of 40 CFR 61, Subpart M when conducting any renovation or demolition at the facility.

3 Sawmill/Dry Kilns

3.1 Process Description

The sawmill processes raw logs and resaw cedar into green dimensional lumber. A cyclone pneumatically transfers sawdust and wood waste generated at the sawmill to a truck for removal off-site. Green lumber is dried in any of ten electrically heated dehumidification dry kilns. Passive roof vents atop each kiln exhaust emissions to the atmosphere. Dried lumber is finished in the planer mill. Planer shavings/chips are pneumatically transferred to storage truck bins by cyclones.

3.2 Control Description

Cyclones transfer and control PM_{10} emissions from the sawmill. PM_{10} and VOC emissions from the dry kilns are uncontrolled.

Table 3.1 Dry Kilns and Sawmill Description

Emissions Units / Processes	Control Devices	Emission Points
Sawmill	Cyclones	Cyclone exhaust stack openings
Dry kilns	None	Kiln roof vents

Emission Limits

3.3 Emission Limits

Emissions of PM_{10} and VOC from the dry kilns shall not exceed any corresponding emissions rate limits listed in the following table.

Table 3.2 Dry Kilns Emission Limits

Source Description	PM_{10}	VOC
	lb/day	T/yr
Dry kilns	6.84	67.5

Operating Requirements

3.4 Throughput Limits

The sawmill shall not produce more than 90 million board feet of green lumber per any consecutive 12-month period. The dry kilns shall not dry more than 90 million board feet of green lumber per any consecutive 12-month period.

Monitoring and Recordkeeping Requirements

3.5 Throughput Monitoring

The permittee shall monitor and record the monthly production of both the sawmill and dry kilns. Each month, the permittee shall record the monthly production of the sawmill and dry kilns, and calculate and record the sawmill and dry kilns production for the most recent 12-month period. The most recent five years' compilation of data shall be kept onsite and shall be made available to DEQ representatives upon request.

3.6 Reporting Requirements

The permittee shall report any exceedance of the sawmill and/or dry kilns production limits within five working days of the exceedance.

4 Wood Byproduct Bins Loadout

4.1 Process Description

Wood byproducts generated during the creation of dimensional lumber generally consist of bark, sawdust, chips and shavings. These byproducts are generally moved from place to place through either pneumatic devices or conveyors that deliver the byproducts to bins or trucks. Fugitive emissions are generated at process points not vented through a stack, chimney, vent, or other functionally equivalent opening.

Monitoring and Recordkeeping Requirements

4.2 Fugitive Emissions Monitoring

The permittee shall conduct monthly inspections of fugitive emissions while the truck loadout system is operating, during daylight hours, and under normal operating conditions to ensure 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 truck loadout system inspection and any corrective actions taken. The records shall be kept onsite and shall be made available to DEQ representatives upon request.

General Provisions

General Compliance

5.1 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.]

5.2 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]

5.3 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

5.4 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

5.5 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]

5.6 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

5.7 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.

5.8 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.

5.9 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 and 4/11/15]

Monitoring and Recordkeeping

5.10 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

5.11 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

5.12 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

5.13 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

5.14 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

5.15 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

5.16 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]