STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

October 6, 2016

Greg Easton, Vice President Millwork
Woodgrain Millwork Inc.
300 NW 16th Street
Fruitland, ID 83619

RE: Facility ID No. 075-00001, Woodgrain Millwork Inc., Fruitland
Final Permit Letter

Dear Mr. Easton:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P- 2016.0031 Project 61729 to Woodgrain Millwork Inc., Fruitland located at Fruitland for converting the Tier II Operating Permit and Permit to Construct (Tier II/PTC) to a PTC. 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 June 10, 2016.

This permit is effective immediately and replaces Tier II/PTC No. T2-020024, issued July 6, 2007. This permit does not release Woodgrain Millwork Inc., Fruitland from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. This permit does not contravene T1-2012.0011; therefore, it will be incorporated into the T1 operating permit upon renewal.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, AQ Compliance Officer, at (208) 373-0419 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 Shawnee Chen at (208) 373-0502 or Shawnee.chen@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

MS\SYC

Permit No. P- 2016.0031 PROJ 61729

Enclosures

Printed on Recycled Paper

Air Quality

PERMIT TO CONSTRUCT

Permittee	Woodgrain Millwork Inc, Fruitland
Permit Number	P-2016.0031
Project ID	61729
Facility ID	075-00001
Facility Location	300 NW 16th Street Fruitland, ID 83619

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 October 6, 2016

Shawnee Chen, P.E., Permit Writer

Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is a Permit to Constrct (PTC) to convert the Tier II operating permit and Permit to Construct (Tier II/PTC) to a PTC.

[10/6/2016]

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.

[10/6/2016]

1.3 This PTC replaces Tier II/PTC No. T2-020024, issued July 6, 2007.

[10/6/2016]

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Facility-Wide Conditions	None
3	Millwork Cyclone B	None
3	Millwork Cyclone C	None
3	Millwork Cyclone I	None
3	Millwork Baghouse G	None
3	Millwork Baghouse E	None
3	Millwork Cyclone J	None
3	Millwork Cyclone K	None
3	Millwork Baghouse L	None
3	Millwork/Optimizing Baghouse M	None
3	Millwork Baghouse N	None
3	Millwork Cyclone D	None
3	Decramold Cyclone H	None
4	Coating and Gluing	None
5	Printing	None

2 Facility-Wide Conditions

2.1 The permittee shall comply with the facility-wide conditions of Tier I Operating Permit No. T1-2012.0011 issued on January 28, 2013 or subsequent revisions or renewals to the permit.

[10/6/2016]

3 Wood Processing and Handling

3.1 Process Description

This emission unit consists of the wood processing and handling operations for the following process areas at the Fruitland facility: Prefinish, Wrap, Basecoat, Print, Millwork, Optimization, Animal Bedding Bailing, and Storage. Wood processing consists of cutting, moulding, shaping, and joining of wood. Wood processing also consists of wood treatment for fungicide, base coat application, painting, and lamination, and hammer hog processing of scrap materials. Wood handling consists of the transfer of sawdust and shavings by pneumatic conveyance and drop transfers for the following process areas: Prefinish, Wrap, Basecoat, Print, Millwork, Optimization, Animal Bedding Bailing, and Storage. Emissions are uncontrolled.

Table 3.1 Emissions Unit Description

Emissions Units / Processes	Control Devices	Emission Point
Millwork Cyclone B	Uncontrolled	Cyclone B Stack
Millwork Cyclone C	Uncontrolled	Cyclone C Stack
Millwork Cyclone I	Uncontrolled	Cyclone I Stack
Millwork Baghouse G	Uncontrolled	Baghouse G Stack
Millwork Baghouse E	Uncontrolled	Baghouse E Stack
Millwork Cyclone J	Uncontrolled	Cyclone J Stack
Millwork Cyclone K	Uncontrolled	Cyclone K Stack
Millwork Baghouse L	Uncontrolled	Baghouse L Stack
Millwork/Optimizing Baghouse M	Uncontrolled	Baghouse M Stack
Millwork Cyclone D	Uncontrolled	Cyclone D Stack
Decramold Cyclone H	Uncontrolled	Cyclone H Stack

Operating Requirements

3.2 General Compliance Requirements

At all times when operating the Prefinish and Millwork processes, the permittee shall operate the wood processing and handling equipment listed in Table 3.1 of Permit Condition 3.1.

[7/6/2007]

4 Coating and Gluing

4.1 Process Description

This process consists of coating and gluing operations for the following manufacturing areas at the Fruitland facility: Prefinish and Millwork - Woodtreat. Coating and gluing consists of roll coating, fan coating, curtain coating, gluing, and wood treatment operations at the facility.

4.2 Control Device Descriptions

Volatile organic Compounds (VOC) emissions from the coating and gluing are uncontrolled. Hazardous air pollutants (HAP) emissions are controlled by limiting the HAP content of coatings, thinners, and cleaning materials used in the coating and gluing operation.

Emission Limits

4.3 HAP Emission Limits

- Facility-wide HAP emissions shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.
- Facility-wide HAP emissions shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.
- Facility-wide acetaldehyde emissions shall be less than 0.148 lbs/hr.
- Facility-wide formaldehyde emissions shall be less than 0.048 lbs/hr.

[7/6/2007]

4.4 VOC Emission Limit

Facility-wide VOC emissions shall not exceed 813.6 tons per year.

[7/6/2007]

40 CFR 63, Subpart QQQQ

4.5 The permittee shall comply with the applicable requirements in 40 CFR 63, Subpart QQQQ. Refer to Tier I Operating Permit No. T1 2012.0011 issued on January 28, 2013 or its subsequent revisions or renewals for details.

[10/6/2016]

Monitoring and Recordkeeping Requirements

4.6 Material Purchase Records

- The permittee shall maintain the purchase records of all manufacturing-related materials that contain HAP including, but not limited to, adhesives, caulks, solvents, and paints.
- The permittee shall maintain the purchase records of all manufacturing-related materials that contain VOC including, but not limited to, adhesives, caulks, solvents, and paints.

[7/6/2007]

4.7 Material Safety Data Sheets

- The permittee shall maintain the safety data sheet (SDS) for the manufacturing-related materials that contain HAP purchased pursuant to Permit Condition 4.6. The SDS shall remain on site at all times and shall be made available to DEQ representatives upon request.

- The permittee shall maintain the SDS for the manufacturing-related materials that contain VOC purchased pursuant to Permit Condition 4.6. The SDS shall remain on site at all times and shall be made available to DEQ representatives upon request.

[7/6/2007]

4.8 Material Usage Records

- The permittee shall monitor and record monthly, the usage of each manufacturing-related material that contains HAP. The usage records shall remain on site for the most recent five years period and shall be made available to DEQ representatives upon request.
- The permittee shall monitor and record monthly, the usage of each manufacturing-related material that contains VOC. The usage records shall remain on site for the most recent five years period and shall be made available to DEQ representatives upon request.

[7/6/2007]

4.9 VOC Monitoring Requirements

The permittee shall monitor and record the monthly and annual VOC emissions from the process using the purchase records required by Permit Condition 4.6, the SDS required by Permit Condition 4.7, and the material usage records required by Permit Condition 4.8 to demonstrate compliance with Permit Condition 4.4. Annual VOC emissions shall be determined by summing monthly VOC emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent five years period and shall be made available to DEQ representatives upon request.

[7/6/2007]

4.10 HAP Monitoring Requirements

The permittee shall monitor and record the monthly and annual HAP emissions from the process using the purchase records required by Permit Condition 4.6, the SDS required by Permit Condition 4.7, and the material usage records required by Permit Condition 4.8 to demonstrate compliance with Permit Condition 4.3. Annual HAP emissions shall be determined by summing monthly HAP emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent five years period and shall be made available to DEQ representatives upon request.

[7/6/2007]

5 Printing

5.1 Process Description

This emission unit consists of the printing operations at the Fruitland facility. Printing consists of product rotogravure printing of substrate which is applied to products manufactured at facility.

5.2 Control Device Descriptions

VOC and HAP emissions from the printing process are uncontrolled.

Emission Limits

5.3 Emission Limits

Facility-wide VOC emissions shall not exceed 813.6 tons per year.

[7/6/2007]

5.4 HAP Emission Limits

- Facility-wide HAP emissions shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.
- Facility-wide HAP emissions shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.
- Facility-wide acetaldehyde emissions shall be less than 0.148 lbs/hr.
- Facility-wide formaldehyde emissions shall be less than 0.048 lbs/hr.

[7/6/2007]

40 CFR 63, Subpart KK

5.5 The permittee shall comply with the applicable requirements in 40 CFR 63, Subpart KK. Refer to Tier I Operating Permit No. T1 2012.0011 issued on January 28, 2013 or its subsequent revisions or renewals for details.

[10/6/2016]

Operating Requirements

5.6 Material Purchase Records

- The permittee shall maintain the purchase records of all manufacturing-related materials that contain HAP including, but not limited to, adhesives, caulks, solvents, and paints.
- The permittee shall maintain the purchase records of all manufacturing-related materials that contain VOC including, but not limited to, adhesives, caulks, solvents, and paints.

[10/6/2016]

5.7 Material Safety Data Sheets

The permittee shall maintain the SDS for the manufacturing-related materials that contain HAP and/or VOC purchased pursuant to Permit Condition 5.6.

[7/6/2007]

5.8 The facility waste stream shall be analyzed using an approved analytical method. The analysis must clearly indicate the volume of the waste stream (gallons) and the VOC and HAP contents (lb/gal) of the waste stream.

Monitoring and Recordkeeping Requirements

5.9 Material Usage Records

- The permittee shall monitor and record monthly, the usage of each manufacturing-related material that contains HAP. The usage records shall remain on site for the most recent five years period and shall be made available to DEQ representatives upon request.
- The permittee shall monitor and record monthly, the usage of each manufacturing-related material that contains VOC. The usage records shall remain on site for the most recent five years period and shall be made available to DEQ representatives upon request.

[7/6/2007]

5.10 VOC Monitoring Requirements

The permittee shall monitor and record the monthly and annual VOC emissions using the purchase records required by Permit Condition 5.6, the SDS required by Permit Condition 5.7, VOC waste stream data required by Permit Condition 5.8 and the material usage records required by Permit Condition 5.9 to demonstrate compliance with Permit Condition 5.3. Annual VOC emissions shall be determined by summing monthly VOC emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent five years period and shall be made available to DEQ representatives upon request.

[7/6/2007]

5.11 HAP Monitoring Requirements

The permittee shall monitor and record the monthly and annual HAP emissions using the purchase records required by Permit Condition 5.6, the SDS required by Permit Condition 5.7, HAP waste stream data required by Permit Condition 5.8 and the material usage records required by Permit Condition 5.9 to demonstrate compliance with Permit Condition 5.4. Annual HAP emissions shall be determined by summing monthly HAP emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent five years period and shall be made available to DEQ representatives upon request.

[7/6/2007]

6 General Provisions

General Compliance

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

[Idaho Code §39-101, et seq.]

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

[IDAPA 58.01.01.211, 5/1/94]

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

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

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

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

[Idaho Code §39-108]

Construction and Operation Notification

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

[IDAPA 58.01.01.211.02, 5/1/94]

6.6 The permittee shall furnish DEQ written notifications as follows:

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

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- 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

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 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

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

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

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

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

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

[IDAPA 58.01.01.123, 5/1/94]

False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

Transferability

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

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

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

[IDAPA 58.01.01.211, 5/1/94]