STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Brad Little, Governor
Jess Byrne, Director

June 7, 2021

Thomas Lovlien, Vice President – Lumber & Composites
Woodgrain Millwork - Emmett
500 West Main
Emmett, ID 83617

RE: Facility ID No. 045-00006, Woodgrain Millwork - Emmett, Emmett
Final Permit Letter

Dear Mr. Lovlien:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2010.0016 Project 62579 to Woodgrain Millwork - Emmett located at Emmett for increasing the ponderosa pine annual throughput and kiln annual VOC emissions limit. 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 February 8, 2021.

This permit is effective immediately and replaces PTC No. P-2010.0016, issued January 7, 2021. This permit does not release Woodgrain Millwork - Emmett 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 Boise Regional Office, 1445 N. Orchard, 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, as requested, David Luft, Air Quality Manager, at (208) 373-0201 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 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 Bureau Chief
Air Quality Division

MS\syc

Permit No. P-2010.0016 PROJ 62579

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	Woodgrain Millwork - Emmett
Permit Number	P-2010.0016
Project ID	62579
Facility ID	045-00006
Facility Location	500 West Main Emmett, ID 83617

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 June 7, 2021

Shawnee Chen, PE, Permit Writer

Mike Simon, Stationary Source Bureau Chief

Contents

1 Permit condition

Purpose

1.1 This is a revised permit to construct (PTC) to increase the Ponderosa Pine throughput to the drying kilns to 70.2 million board feet per year and to increase the drying kilns VOC emissions limit to 97.2 tons per year.

[6/7/2021]

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-2010.0016 issued on January 7, 2021.

[6/7/2021]

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	Boiler1 Boiler No. 1 Manufacturer: Cleaver-Brooks Model: CB 200-500-150, packaged boiler Manufacture date: 1997 Serial No. OLO96563 Heat Rating: 20.925 MMBtu/hr Fuel: Natural gas only Max. steam production: 21,572 lb/hr ~675 boiler hp	None
2	Boiler2 Manufacturer: Nebraska Model: TBD, packaged boiler Manufacture date: 1982 Installed date: 2017 Serial No. 2D2034 Heat Rating : 33.5 MMBtu/hr Fuel: Natural gas only Max. steam production: 34,510 lb/hr 1,000 boiler hp	None
3	Kiln1 Manufacturer: Wellons Model: Double-track, Length 104 ft Maximum Capacity: 184,000 board feet/charge	None
3	Kiln2 Manufacturer: Wellons Model: Double-track, Length 104 ft Maximum Capacity: 184,000 board feet/charge	None
3	Kiln3 Manufacturer: Coe Model: Double-track, Length 120 ft Maximum Capacity: 215,000 board feet/charge	None
3	Kiln4 Manufacturer: USNR Model: Double-track, Length 120 ft Maximum Capacity: 215,000 board feet/charge	None

Permit Section	Source	Control Equipment
3	Kiln5 Manufacturer: USNR Model: Double-track, Length 120 ft Maximum Capacity: 215,000 board feet/charge	None
4	Sawmill Sawdust generated from the sawmill will be pneumatically conveyed to the sawdust bin. A chipper is fully enclosed within the sawmill. The woodwaste generated by the chipper is chain driven to the chip bin which is fully enclosed. The sawdust and wood chips bins are periodically unloaded via a truck through a partially enclosed flap.	Debarker is enclosed. Sawdust bin with a cyclone is uncontrolled. Chip bin is fully enclosed. Sawdust and chip bins are unloaded to a truck through partially enclosed flap.
4	Planer mill Planer shavings from the planer mill are pneumatically conveyed to a cyclone where the shavings drop into a planer shavings storage bin, and fine particulates from the shavings cyclone separator are routed to a baghouse. Fine particles from the trimmer of the planer mill are pneumatically conveyed to a cyclone where the fine particles drop into a planer shavings storage bin, and fine particulates from the trimmer cyclone separator are routed to the trimmer baghouse. The shavings bins are periodically unloaded via a truck through a partially enclosed flap. The planer operation and the trimmer operation are in series.	Particulate emissions from the planer are controlled by a cyclone and a baghouse. Particulate emissions from the trimmer are controlled by a cyclone and a baghouse. Shaving bins are unloaded to truck through partially enclosed flap. Baghouse PM_{10} control efficiency is 99%.
5	Emergency Fire Pump Engine Mfr: Caterpillar Model: C7.1 Displacement < 10 liters per cylinder, 6 cylinder Rated capacity: Max 140 bhp (104 kW) Fuel: ULSD Tier III certified	None
6	Fugitive dust sources These include the debarker, sawmill, hog, screens, woodwaste storage pile, trucks driving on paved and unpaved roads, woodwaste truck unloading, etc.	Reasonable control of fugitive dust

[6/7/2021]

2 Boilers

2.1 Process Description

The two natural gas boilers produce steam for indirect heating of the dry kilns. Boiler1 was installed in 2015 as an exempt project and is now modified to support heat to Kiln1 and Kiln2. Boiler2 was installed in 2017 to heat the three new dry kilns: Kiln3, Kiln4, and Kiln5.

2.2 Control Device Descriptions

Each boiler has its own stack and there are no emission controls on the boilers.

Emission Limits

2.3 Emission Limits

The emissions from the boiler stacks shall not exceed any corresponding emissions rate limits listed in Table 2.1.

Table 2.1 Boiler Emission Limits[a]

Source Description	$PM_{10}/PM_{2.5}$ [b]		NO_X		VOC	
	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]
Boiler1	0.16	0.68	2.06	9.00	0.11	0.50
Boiler2	0.25	1.09	3.29	14.4	0.18	0.792

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 10 micrometers and 2.5 micrometers respectively, 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.

[8/10/2017]

2.4 Opacity Limit

Emissions from the Boiler stacks, or any other stack, vent, or functionally equivalent opening associated with the boilers, 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.

[8/10/2017]

Operating Requirements

2.5 Fuel Types

The boilers shall be fired exclusively with natural gas fuel.

[8/10/2017]

2.6 Steam Production Limits

- The amount of steam produced by Boiler1 shall not exceed 21,572 pounds of steam per hour averaged over any consecutive 24-hour period.
- The amount of steam produced by Boiler2 shall not exceed 34,510 pounds of steam per hour averaged over any consecutive 24-hour period.

[8/10/2017]

2.7 Steam Production Measuring Device

The permittee shall install, maintain, calibrate, and operate, in accordance with manufacturer specifications, equipment to continuously measure the steam production rate of Boiler1 and Boiler2.

[8/10/2017]

Monitoring and Recordkeeping Requirements

2.8 Steam Production Monitoring

The permittee shall monitor and record the pounds of steam produced for each calendar hour to demonstrate compliance with Boiler1 and Boiler2 steam production limits. The steam production rate shall be recorded as pounds per hour. The steam production rate records for the Boiler1 and Boiler2 shall be maintained at the facility in accordance with the Monitoring and Recordkeeping of the General Provisions of this permit.

[8/10/2017]

2.9 NSPS, 40 CFR 60, Subpart Dc - Notification Requirements

- The permittee shall submit to DEQ a notification of the date of construction or reconstruction and actual startup, as provided by 40 CFR 60.7, in accordance with 40 CFR 60.48c. This notification shall include the design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- All records required under this section shall be maintained by the permittee in accordance with the Monitoring and Recordkeeping requirements of the General Provisions of this permit.
- NSPS 40 CFR 60, Subpart A – General Provisions for Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units)

The permittee must comply with the requirements in General Provisions of 40 CFR 60, Subpart A.

Generally applicable reporting, recordkeeping and notification requirements of Subpart A of the New Source Performance Standards (NSPS, 40 CFR 60) are included in Table 2.2. These summaries are provided to highlight the notification and recordkeeping requirements of 40 CFR 60 for affected facilities, and are not intended to be a comprehensive listing of all general provision requirements that may apply nor do the summaries relieve the permittee from the responsibility to comply with all applicable requirements of the CFR. Should there be a conflict between these summaries and the NSPS, the NSPS shall govern. The permittee is encouraged to read all of 40 CFR 60 Subpart A.

2.10 NSPS, 40 CFR 60, Subpart Dc – Fuel Monitoring Requirements

In accordance with 40 CFR 60.48c (g)(1), except as provided as follows, the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.

As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO_2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit

where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in §60.42c to use fuel certification to demonstrate compliance with the SO_2 standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.

[8/28/2014]

Table 2.2 Summary of Applicable Requirements of NSPS 40 CFR 60 Subpart A- General Provisions

Section	Subject	Summary of Section Requirements
60.4	Address	All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart(s) shall be submitted to: Department of Environmental Quality Boise Regional Office 1445 N. Orchard Boise, ID 83706-2239
60.7(a),(b), and (f)	Notification and Recordkeeping	• Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date. • Notification shall be furnished of initial startup postmarked within 15 days of such date. • Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made. • Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative. • Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.
60.12	Circumvention	• No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.
60.14	Modification	• A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14. • Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.
60.15	Reconstruction	• An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.

[40 CFR 60.48c, Subpart A, 12/30/2010]

3 Drying Kilns

3.1 Process Description

Five double track dry kilns with computerized steam controls are used to dry green lumber. The kilns are indirectly heated by using steam which is supplied by Boiler1 and Boiler2. The steam is supplied to heating coils within the kilns which transfer heat to the stacked lumber to drive off the desired amount of moisture. Fans inside the kilns circulate the heated air inside the kilns, and vents in the roof of each kiln are opened and closed to maintain the desired conditions within the kiln.

[6/7/2021]

3.2 Control Device Descriptions

Emissions from the dry kilns are uncontrolled.

Emission Limits

3.3 Emission Limits

Emissions from all kilns shall not exceed the emission rate limits in Table 3.1.

Table 3.1 Kiln Emission Limits [a]

	$PM_{10}/PM_{2.5}$ lb/hr[b][e]		$PM_{2.5}$ T/yr[c]	VOC[d] T/Yr
	When Operating Five Kiln 1-5 Simultaneously	When Operating Kiln 1 and Kiln 2 with only one of Kiln 3, Kiln 4, and Kiln 5		
Kilns 1-5, combined	---	---	0.9	97.20
Kiln 1	0.0750	0.1472	---	---
Kiln 2	0.0750	0.1472	---	---
Kiln 3	0.0860	0.1720[f]	---	---
Kiln 4	0.0860	0.1720[f]	---	---
Kiln 5	0.0860	0.1720[f]	---	---

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

b) PM with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM_{10}), including condensable PM as defined in IDAPA 58.01.01.006.

c) PM with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers ($PM_{2.5}$), including condensable PM as defined in IDAPA 58.01.01.006.

d) Volatile organic compounds (VOC), based on rolling 12-month period.

e) 24-hour average

f) Can only operate one of Kiln 3, Kiln 4, and Kiln 5 with Kiln 1 and Kiln 2.

[6/7/2021]

Operating Requirements

3.4 Kilns Temperature Limits

The maximum temperature of the heated air entering the lumber for each kiln shall not exceed 180^{o}F during operation.

[1/7/2021]

3.5 Wood Species

The kiln can dry the following wood species:

WF = White Fir, including white fir, grand fir, noble fir, and subalpine fir
PP = Ponderosa Pine
LP = Lodgepole Pine

DF = Douglas Fir, Engelmann Spruce and larch are grouped with Douglas Fir

[6/7/2021]

3.6 Maximum Throughput Limits

The maximum lumber throughput to the five drying kilns shall not exceed 90 million board feet per year, in any consecutive 12-month period (MMBF/yr).

In addition,

- The total lumber throughput of Ponderosa Pine to the five drying kilns shall not exceed 70.2 MMBF/yr with the balance of 19.8 MMBF/year of any other wood species allowed in Permit Condition 3.5.

[6/7/2021]

3.7 Kilns Temperature Device

The permittee shall install, calibrate, maintain, and operate a device to continuously measure the maximum temperature of the heated air entering the lumber for each lumber drying kiln.

[1/7/2021]

3.8 Kiln Operation Requirements

3.8.1 The permittee shall not load any kiln that exceeds the limit of Maximum Kiln Charge for Each Kiln as specified in Table 3.2.

3.8.2 For each kiln, the kiln drying hours per run shall not be less than the Minimum Lumber Drying Hours per Run or per Cycle as specified in Table 3.2 (e.g., 50 hours).

3.8.3 When drying Douglas Fir, only one of kiln 3, 4, and 5 can be currently used with kiln 1 and kiln 2.

3.8.4 Alternative Minimum Lumber Drying Hours per Run (per Cycle)

The permittee may use the formula specified in Table 3.2 to determine Maximum Kiln Charge for Each Kiln at a proposed Minimum Lumber Drying Hours per Run (per Cycle) when the Minimum Lumber Drying Hours per Run (per Cycle) is less than the respective hours specified in Table 3.2.

Prior to loading the kiln, the permittee shall calculate the Maximum Kiln Charge for Each Kiln at the proposed Minimum Lumber Drying Hours per Run (per Cycle). The permittee shall record and maintain the proposed Minimum Lumber Drying Hours per Run (per Cycle) and the calculated Maximum Kiln Charge for Each Kiln.

3.8.5 The kiln vent covers are required to be oriented at fully vertical orientation at all times when opened in order to not impede dispersion of the kiln drying exhaust plumes.

Table 3.2 Short-term Species Scenarios by Kiln [e]

Kiln Drying Operation[g]	Species Distribution	Maximum Kiln Charge for Each Kiln (BF/Kiln)	Species and Board	Minimum Lumber Drying Hours per Run or per Cycle (hours) [f]
1	WF[a], PP[b], and/or LP[c] Kiln 1 & 2	184,000	Dimension boards	50
2	WF, PP, and/or LP Kiln 3, 4, & 5	215,000		
3	PP[b]/LP[c] Kiln 1 & 2	150,000	Pine 4 quarter boards, 1" thickness	40
4	PP/LP Kiln 3, 4, & 5	161,000		
5	WF, PP, and/or LP Kiln 1 & 2	(T_i hr) * (0.0750 lb/hr) * (1,000 BF/MBF)/(0.02 lb/MBF)), but not to exceed the kiln's maximum design capacity	Dimension boards and Pine 4 quarter boards, 1" thickness	T_i, (i=Kiln1, or Kiln2)
6	WF, PP, and/or LP Kiln 3, 4, & 5	(T_j hr) * (0.0860 lb/hr) * (1,000 BF/MBF)/(0.02 lb/MBF)), but not to exceed the kiln's maximum design capacity		T_j (j=Kiln3, Kiln4, or Kiln5)
7	DF[d] Kiln 1 & 2	184,000	Douglas Fir	25
8	DF Kiln 3, 4, or 5	215,000		25
9	DF[d] Kiln 1 & 2	(T_{DFi} hr) * (0.1472 lb/hr) * (1,000 BF/MBF)/(0.02 lb/MBF), but not to exceed the kiln's maximum design capacity	Douglas Fir	T_{DFi}, (i=Kiln1, or Kiln2)
10	DF Kiln 3, 4, or 5	(T_{DFj} hr) * (0.1720 lb/hr) * (1,000 BF/MBF)/(0.02 lb/MBF), but not to exceed the kiln's maximum design capacity		T_{DFj} (j=Kiln3, Kiln4, or Kiln5)

a) WF = White Fir, including white fir, grand fir, noble fir, and subalpine fir
b) PP = Ponderosa Pine
c) LP = Lodgepole Pine
d) DF = Douglas Fir, Engelmann Spruce and larch are grouped with Douglas Fir.
e) $PM_{2.5}/PM_{10}$ emissions factor (EF) = 0.02 lb/MBF
f) Per Run and per Cycle mean the same thing. It means the drying cycle.
g) The kiln drying operation can be mix-and-match except when drying Douglas Fir, only one of kiln 3, 4, and 5 can be concurrently used with kiln 1 and kiln 2.

[1/7/2021]

Monitoring and Recordkeeping Requirements

3.9 Temperature Monitoring

The permittee shall monitor and record the maximum temperature of the air entering the lumber achieved per drying cycle for each of the lumber drying kilns once per day. The records of temperature of the kilns shall be maintained at the facility in accordance with the Monitoring and Recordkeeping of the General Provisions of this permit.

[1/7/2021]

3.10 Kiln Operation Monitoring

The permittee shall monitor and record which kilns are operating at all times. For each kiln, the permittee shall monitor and record the following parameters to demonstrate compliance with Kiln Operation Requirements permit condition:

- Wood species in each kiln, amount of lumber being dried in each kiln in BF/kiln, drying hours, and type of boards (e.g., 4 quarter boards with 1" thickness, dimension boards).

- The permittee shall record and keep the calculation and the proposed Minimum Lumber Drying Hours per Cycle when Alternative Minimum Lumber Drying Hours per Run (per Cycle) is used.

[1/7/2021]

3.11 Lumber Throughput Monitoring

The permittee shall monitor and record monthly and annually, the throughput of each lumber species charged to the five dry kilns to demonstrate compliance with the maximum throughput limits in Maximum Throughput Limits permit condition. Throughput shall be recorded as million board feet, or 1,000 board feet increments. For each wood species, annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-month period.

[5/27/2021]

4 Sawmill and Planer Mill

4.1 Process Description

The facility has an enclosed debarker, sorter, and a sawmill that includes water sprays to help control emissions and to cool the saw blades. Sawdust and fines from sawmill are pneumatically conveyed to a sawdust storage bin. Green chips from sawmill are conveyed to the chip bin(s) by a mechanical (chain) conveyor. The chip bin is fully enclosed.

After being dried in the kilns, lumber is planned, and some are trimmed to final dimensions in the planer mill. The planer mill shavings from the planer are pneumatically conveyed to an enclosed shavings bin containing a cyclone and a baghouse system to control particulate emissions. The shavings from the trimmer are pneumatically conveyed to an enclosed shavings bin containing a cyclone and a baghouse system to control particulate emissions. Dry wood shavings are periodically unloaded from the shavings bin by truck through a partially enclosed flap.

[1/7/2021]

4.2 Control Device Descriptions

Table 4.1 Stetson Planer Mill Description

Emissions Units / Processes	Control Devices	Emission Points
Sawdust Bin Venting	Cyclone[a]	Sawdust Bin Cyclone vent
Planer Mill Planer	Cyclone followed by planer baghouse	Planer baghouse stack
Planer Mill Trimmer	Cyclone followed by trimmer baghouse	Trimmer baghouse stack

a) Process equipment

[1/7/2021]

Emission Limits

4.3 Emission Limits

The emissions from the sawdust bin cyclone vent, planer baghouse stack, and the trimmer baghouse stack shall not exceed any corresponding emissions rate limits listed in Table 4.2.

Table 4.2 Planer and Trimmer Baghouses Emission Limits[a]

Source Description	$PM_{2.5}$[b]		PM_{10}[c]
	lb/hr [d]	T/yr [e]	lb/hr
Planer baghouse stack	0.30	0.34	0.45
Trimmer baghouse stack	0.15	0.17	0.22
Sawdust bin cyclone vent	0.21	0.43	0.15

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 two point five (2.5), including condensable particulate as defined in IDAPA 58.01.01.006.
c) PM with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM_{10}), including condensable PM as defined in IDAPA 58.01.01.006.
d) 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. It is based on a 24-hour averaging period.
e) Tons per any consecutive 12-calendar month period.

[1/7/2021]

Operating Requirements

4.4 Throughput Limits

- The throughput of lumber processed by the planer in the planer mill shall not exceed 960 thousand board feet per calendar day (MBF/day).

[1/7/2021]

- The throughput of lumber processed by the trimmer in the planer mill shall not 480 thousand board feet per calendar day (MBF/day).

[1/7/2021]

- The throughput of lumber processed by the planer mill shall not exceed 90 million board feet during any consecutive 12-month period.

4.5 Baghouse Operating Requirements

The permittee shall install and operate a cyclone and a baghouse to control particulate emissions from the trimmer of the planer mill.

[1/7/2021]

The permittee shall install and operate a cyclone and a baghouse to control particulate emissions from the planer of the planer mill.

Within 60 days of the permit issuance, the permittee shall have developed a baghouse procedures document for the inspection and operation of the planer baghouse and trimmer baghouse which controls particulate emissions from the planer mill. The baghouse procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The baghouse procedures document shall describe the procedures that will be followed to comply with the General Compliance in the PTC General Provisions of this permit and shall contain requirements for quarterly see-no-see visible emissions inspections of the baghouse. The inspections shall occur during daylight hours and under normal operating conditions.

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

- Procedures to determine if bags are ruptured; and

- Procedures to determine if bags are not appropriately secured in place.

The permittee shall maintain records of the results of each baghouse inspections in accordance with Monitoring and Recordkeeping in the General Provisions of this permit. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The baghouse procedures document shall be submitted to DEQ within 60 days of permit issuance for review and comment and shall contain a certification by a responsible official. Any changes to the baghouse procedures document shall be submitted within 15 days of the change.

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

The operating and monitoring requirements specified in the baghouse procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[1/7/2021]

4.6 The chip bin shall be fully enclosed.

[1/7/2021]

Monitoring and Recordkeeping Requirements

4.7 Throughput Monitoring

The permittee shall monitor and record the throughput of lumber for the planer in units of board feet per day and divide it by 24 hr/day to demonstrate compliance with the planer mill hourly throughput limit in Throughput Limits Permit Condition. The records shall be maintained on site in accordance with Monitoring and Recordkeeping of the General Provisions of this permit.

[1/7/2021]

The permittee shall monitor and record the throughput of lumber for the trimmer in units of board feet per day and divided it by 24 hr/day to demonstrate compliance with the planer mill hourly throughput limit in Throughput Limits Permit Condition. The records shall be maintained on site in accordance with Monitoring and Recordkeeping of the General Provisions of this permit.

[1/7/2021]

Each month, the permittee shall monitor and record the throughput of lumber for the planer mill in units of million board feet for that month and for the most recent 12-month period. Annual throughput shall be determined by summing monthly throughput over the previous consecutive 12-month period.

[12/30/2010]

Source Testing

4.8 Source Testing Planer and Trimmer Baghouses

By June 7, 2021, the permittee shall perform a source test on the planer baghouse stack and Trimmer baghouse stack to demonstrate compliance with the hourly $PM_{2.5}$ emissions limits of the planer baghouse and Trimmer baghouse in the Emissions Limits Permit Condition.

[6/7/2021]

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

The permittee shall test in accordance with IDAPA 58.01.01.157 and the conditions of this permit including the operating requirements for the planer mill and in accordance with the General Provisions of this permit which contain notification, testing procedures and reporting requirements.

The permittee shall monitor and record the following during the performance test:

- The throughput of lumber processed by the planer mill
- The throughput of lumber processed by the planer and the throughput of lumber processed by the trimmer
- The amount of material sent to the planer cyclone and the amount of material sent to the trimmer cyclone

- The amount of material sent to the planer baghouse and the amount material sent to the trimmer baghouse

The source test shall be conducted under "worst case normal" conditions as required by IDAPA 58.01.01.157, the General Provisions of this permit, and the source test report shall contain documentation that the test was conducted under these conditions.

[1/7/2021]

5 Emergency Fire Pump engine

5.1 Process Description

The emergency fire pump engine is a Caterpillar C7.1 unit that is Tier 3 certified or better and purchased in lieu of performance testing per Subpart IIII. The engine is subject to further requirements specified in 40 CFR 60, Subpart IIII for an emergency compression ignition engine that was modified or constructed after July 11, 2005. Per Section 60.4200(a), the construction date for this engine is 2017.

[8/10/2017]

5.2 Control Device Descriptions

Emissions from the emergency fire pump engine are uncontrolled.

[12/30/2010]

Emission Limits

5.3 Emission Limit

The $PM_{2.5}$ emissions from the emergency fire pump engine stack shall not exceed 0.00192 lb/hr based on a 24-hr average period. In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.

[1/7/2021]

5.4 Opacity Limit

Emissions from the emergency fire pump engine stack, or any other stack, vent, or functionally equivalent opening associated with the emergency fire pump engine, 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.

Operating Requirements

5.5 Hours of Operation

The maximum hours of operation for the emergency fire pump engine shall not exceed 0.5 hour per day for testing and maintenance purposes. The maximum hours of operation does not apply during emergency situations.

[1/7/2021]

5.6 Fuel Sulfur Content

In accordance with IDAPA 58.01.01.728, no person shall sell, distribute, use, or make available for use, any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade No. 1 fuel oil - 0.3% by weight
- ASTM Grade No. 2 fuel oil - 0.5% by weight**.**

[12/30/2010]

Monitoring and Recordkeeping Requirements

5.7 Visible Emissions Monitoring

The permittee shall conduct a quarterly inspection of visible emissions from the emergency fire pump engine stack during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation of visible emissions. If any visible emissions are present from the emergency fire pump engine stack, 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.

[12/30/2010]

5.8 Hours of Operation Monitoring

The permittee shall monitor and record the hours of operation of the emergency fire pump engine when operating for testing and maintenance and testing. The records shall be maintained on site in accordance with Monitoring and Recordkeeping of the General Provisions of this permit.

[12/30/2010]

5.9 Sulfur Content Monitoring

The permittee shall maintain documentation of supplier verification of the sulfur content in the distillate fuel on an as-received basis for every shipment. All data shall be maintained onsite in accordance with Monitoring and Recordkeeping of the General Provisions of this permit.

[12/30/2010]

40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

5.10 40 CFR 60, Subpart IIII - Emissions Standards for Stationary CI Internal Combustion Engines - Emergency Engines

The permittee shall comply with all applicable emissions and operating standards of 40 CFR 60, Subpart IIII - New Source Performance Standards (NSPS) Compression-ignition (CI) Internal combustion engines (ICE). The permittee shall refer to following sections of the rule:

- The owner or operator shall not discharge exhaust opacity from the CI ICE to exceed 20 percent during acceleration mode, 15 percent during lugging mode, and 50 percent during the peaks in either the acceleration or lugging modes in accordance with 40 CFR 89.113, 40 CFR 60.4202(a)(l) and 40 CFR 60.4205(b).
- The owner or operator shall operate the CI ICE in accordance with manufacturer's certification: 40 CFR 89.112 Table 2, 40 CFR 60.4202(a)(l) and 40 CFR 60.4205(b).

[8/10/2017]

5.11 40 CFR 60, Subpart IIII - Fuel Requirements for Owners and Operators

The permittee shall comply with all applicable fuel requirements for owners and operators of 40 CFR 60, Subpart IIII. The permittee shall refer to following section of the rule:

- Beginning October 1, 2010, the permittee shall use diesel fuel with a maximum sulfur content of 15 ppm and a minimum of Cetane index of 40 or a maximum aromatic content of 35 volume percent in accordance with 40 CFR 80.510(b), 40 CFR 60.4207(b).

[8/10/2017]

5.12 40 CFR 60, Subpart IIII - Compliance, Testing and Other Requirements for Owners and Operators

The permittee shall comply with all applicable compliance, testing and other requirements for owners and operators specified by 40 CFR 60, Subpart IIII. The permittee shall refer to following sections of the rule:

- The owner or operator shall install a non-resettable hour meter prior to startup of the engine in accordance with 40 CFR 60.4209(a).
- The owner or operator shall operate and maintain the stationary CI ICE and control device in accordance to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer. In addition the owner and operator may only change those setting that are permitted by the manufacturer in accordance with 40 CFR 60.421 l(a).
- Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations: 40 CFR 60.421 l (e).

[8/10/2017]

5.13 40 CFR 60, Subpart IIII -Notification, Reports, and Records for Owners and Operators

The permittee shall comply with all applicable notification, reports, and records for owners and operators of 40 CFR 60, SubpartIII. The permittee shall refer to the following sections of 40 CFR 60, Subpart IIII:

- The owner or operator must keep records of the operation of the engine in emergency and non- emergency service that is recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time in accordance with 40 CFR 60.4214(b).

[8/10/2017]

5.14 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:

- Applicable requirements of Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS), 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.

[8/10/2017]

6 Fugitive Dust Sources

6.1 Process Description

Fugitive sources at the facility include the following:

- Milling operations - the debarker, sawmill, hog, and screens
- Woodwaste storage transfer, wind erosion
- Trucks driving on paved and unpaved roads
- Woodwaste trucks unloading

[8/10/2017]

6.2 Control Device Descriptions

Emissions from the above sources are controlled in accordance with IDAPA 58.01.01.650 (Rules for Control of Fugitive Dust).

[3/8/2010]

Operating Requirements

6.3 Reasonable Control of Fugitive Dust Emissions

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 operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

[3/8/2010]

6.4 Fugitive Dust Monitoring

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

The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action taken.

6.5 Reasonable Control Measures

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 take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[3/8/2010]

7 General Provisions

General Compliance

7.1 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.]

7.2 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]

7.3 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

7.4 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

7.5 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]

7.6 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, 5/1/1994]

Performance Testing

7.7 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.

7.8 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.

7.9 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 4/11/2015]

Monitoring and Recordkeeping

7.10 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

7.11 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

7.12 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

7.13 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

7.14 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

7.15 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

7.16 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]