Air Quality

PERMIT TO CONSTRUCT

Permittee	AZEK Building Products
Permit Number	P-2021.0051
Project ID	62734
Facility ID	001-00372
Facility Location	1001 E. Gowen Road Boise, ID 83716

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 February 1, 2022

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1 Permit Scope

Purpose

1.1 This is an initial permit to construct (PTC) to install process equipment for the manufacture of composite deck boards.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
3	Wood Lines 1 - 5: Wood/HDPE Extrusion Lines (includes drying and saw cutting) Max Hourly Throughput: 15,000 lb/hr Max Annual Throughput: 65,700 T/yr	Baghouse Dust Collector (DC01): Manufacturer: Schenck Process Model: 144LST196 FILTER Design Flow: 24,000 cfm Filter: PTFE Membrane Bag PM_{10} control efficiency: 99.98%
3	Wood Lines 6 - 10: Wood/HDPE Extrusion Lines (includes drying and saw cutting) Max Hourly Throughput: 15,000 lb/hr Max Annual Throughput: 65,700 T/yr	Baghouse Dust Collector (DC02): Manufacturer: Schenck Process Model: 144LST196 FILTER Design Flow: 24,000 cfm Filter: PTFE Membrane Bag PM_{10} control efficiency: 99.98%
4	Wood Blend System 1: Wood/HDPE mix blending system for Wood Lines 1 -5 Max Hourly Throughput: 10,000 lb/hr Max Annual Throughput: 32,850 T/yr	Baghouse Dust Collector (DC03): Manufacturer: Schenck Process Model: 2M2F8 FILTER Design Flow: 5,600 cfm Filter: Megabond Media Cartridge PM_{10} control efficiency: 99.99%
4	Wood Blend System 2: Wood/HDPE mix blending system for Wood Lines 1 -5 Max Hourly Throughput: 10,000 lb/hr Max Annual Throughput: 32,850 T/yr	Baghouse Dust Collector (DC04): Manufacturer: Schenck Process Model: 2M2F8 FILTER Design Flow: 5,600 cfm Filter: Megabond Media Cartridge PM_{10} control efficiency: 99.99%
4	Wood Blend System 3: Wood/HDPE mix blending system for Wood Lines 6 -10 Max Hourly Throughput: 10,000 lb/hr Max Annual Throughput: 32,850 T/yr	Baghouse Dust Collector (DC05): Manufacturer: Schenck Process Model: 2M2F8 FILTER Design Flow: 5,600 cfm Filter: Megabond Media Cartridge PM_{10} control efficiency: 99.99%
4	Wood Blend System 4: Wood/HDPE mix blending system for Wood Lines 6 -10 Max Hourly Throughput: 10,000 lb/hr Max Annual Throughput: 32,850 T/yr	Baghouse Dust Collector (DC06): Manufacturer: Schenck Process Model: 2M2F8 FILTER Design Flow: 5,600 cfm Filter: Megabond Media Cartridge PM_{10} control efficiency: 99.99%
5	PVC Lines 1 - 5: PVC Extrusion Lines 1 – 5 (includes feeders) Max Hourly Throughput: 9,250 lb/hr Max Annual Throughput: 40,515 T/yr	Baghouse Dust Collector (DC07): Manufacturer: Schenck Process Model: 2M2F8 FILTER Design Flow: 3,500 cfm Filter: Megabond Media Cartridge PM_{10} control efficiency: 99.99%

Permit Section	Source	Control Equipment
5	PVC Lines 6 - 10: PVC Extrusion Lines 6 – 10 (includes feeders) Max Hourly Throughput: 9,250 lb/hr Max Annual Throughput: 40,515 T/yr	Baghouse Dust Collector (DC07): Manufacturer: Schenck Process Model: 2M2F8 FILTER Design Flow: 3,500 cfm Filter: Megabond Media Cartridge PM_{10} control efficiency: 99.99%
6	Wood Regrind: Grinder for waste wood/HDPE product Max Hourly Throughput: 3,000 lb/hr Max Annual Throughput: 365 T/yr	Baghouse Dust Collector (DC08): Manufacturer: Weima Model: 144AST10 Design Flow: 15,000 cfm Filter: 16 oz. polyester filter bag PM_{10} control efficiency: 99.9%
6	PVC Regrind: Grinder for waste PVC product Max Hourly Throughput: 1,850 lb/hr Max Annual Throughput: 365 T/yr	Baghouse Dust Collector (DC09): Manufacturer: Weima Model: FMC 200-6A Design Flow: 6,000 cfm Filter: CA-140 Cartridge PM_{10} control efficiency: 99.9%
8	Truck House: Unloading wood flour/fiber from trucks Max Hourly Throughput: 60,000 lb/hr Max Annual Throughput: 59,154 T/yr	Baghouse Dust Collector (DC10): Manufacturer: Schenck Process Model: 144LST196 FILTER Design Flow: 24,000 cfm Filter: PTFE Membrane Bag PM_{10} control efficiency: 99.98%
7	Pulverizers 1 - 6: Pulverizers for recycled HDPE/LDPE Max Hourly Throughput: 19,800 lb/hr Max Annual Throughput: 86,724 T/yr	Baghouse Dust Collector (DC11): Manufacturer: Schenck Process Model: 144RPT308 FILTER Design Flow: 30,000 cfm Filter: PTFE Membrane Bag PM_{10} control efficiency: 99.98%
	Pellet Mills 1 - 6: Exhaust Air from Pellet Mill Coolers Max Hourly Throughput: 48,000 lb/hr Max Annual Throughput: 131,400 T/yr	Filtered Cyclone Separators (CS01 – CS06): Manufacturer: Simatek Model: JM 32/45-04 4T2-R Design Flow: 5,720 cfm Filter: PP 400 ASY Bag PM_{10} control efficiency: 99%
9	Wood Storage Silos 1 - 12: Bin-vented storage of wood/HDPE extrusion raw materials Max Hourly Throughput: 360,000 lb/hr Max Annual Throughput: 132,370 T/yr	Bin Vents (BV15 – BV26): BV15 & BV16 control the 18’ wood silos BV17 – BV26 control the 14’ wood silos Manufacturer: Schenck Process Model: 39RTC32 Filter: Polipleet Cartridge PM_{10} control efficiency: 99.98%
9	PVC Storage Silos 1 - 14: Bin-vented storage of PVCextrusion raw materials Max Hourly Throughput: 360,300 lb/hr Max Annual Throughput: 82,420 T/yr	Bin Vents (BV01- BV06 & BV09 – BV14): Manufacturer: HorizonPSI Model: Q5-41SFT36-15S Filter: Sidewinder Filter PM_{10} control efficiency: 99.99% Bin Vents (BV07 – BV08): Manufacturer: HorizonPSI Model: Q5-41SFT36-15S Filter: 16 oz. polyester filter bag PM_{10} control efficiency: 99.9%

Permit Section	Source	Control Equipment
2	Radiant Heater 1 (RH-1): Manufacturer: Solaronics Suntube Model: STG-75-30B Heat Input: 0.075 MMBtu/hr Fuel: Natural Gas	None
2	Radiant Heater 1 (RH-2): Manufacturer: CORAYVAC Model: CRVB-6 Heat Input: 0.48 MMBtu/hr Fuel: Natural Gas	None
2	Floor-Mounted Space Heater (ATU-2): Manufacturer: Industrial Airsystems Model: 600/100 Heat Input: 1.25 MMBtu/hr Fuel: Natural Gas	None
2	Floor-Mounted Space Heater (ATU-4): Manufacturer: Industrial Airsystems Model: 600/100 Heat Input: 1.25 MMBtu/hr Fuel: Natural Gas	None
2	Duct Furnaces (DF-1 – DF-10, DF-12): Manufacturer: Reznor Model: HXE Heat Input: 4.4 MMBtu/hr total (0.4 MMBtu/hr each) Fuel: Natural Gas	None
2	Air Conditioning Units (AC-1 and AC-5): Manufacturer: Lennox Model: GCS16-953 Heat Input: 0.2 MMBtu/hr each Fuel: Natural Gas	None
2	Air Conditioning Unit (AC-2): Manufacturer: Lennox Model: GCS16-1353 Heat Input: 0.27 MMBtu/hr Fuel: Natural Gas	None
2	Air Conditioning Units (AC-3 and AC-4): Manufacturer: Lennox Model: GCS16-513-125 Heat Input: 0.125 MMBtu/hr each Fuel: Natural Gas	None
2	Makeup Direct-Fired Units (MAU-1 – MAU-4, MAU -8): Manufacturer: Greenheck Model: DGX-122 Heat Input: 4.84 MMBtu/hr total (0.97 MMBtu/hr each) Fuel: Natural Gas	None
2	Makeup Indirect-Fired Unit (MAU-11): Manufacturer: Greenheck Model: IGX-P109-H12 Heat Input: 0.133 MMBtu/hr Fuel: Natural Gas	None
2	Makeup Indirect-Fired Unit (MAU-12): Manufacturer: Greenheck Model: IGX-P109-H12 Heat Input: 0.089 MMBtu/hr Fuel: Natural Gas	None

2 Facility-Wide Conditions

2.1 O&M Manual

Within 60 days of issuance of this permit, the permittee shall have developed an Operations and Maintenance (O&M) manual for each air pollution control device at this facility based on manufacturer specifications and recommendations. Where available, the manufacturer's O&M manual(s) shall be part of the O&M manual developed by the permittee. All O&M manuals shall remain on site at all times and be made available to DEQ representatives upon request. Additionally, for each air pollution control device, a copy of its respective O&M manual shall be posted at the location of the air pollution control device and shall be readily accessible to shift workers. Each O&M manual shall include the following information at a minimum:

- A general description of the air pollution control device;
- Manufacturer recommended pressure drop operating range.
- Operating instructions and startup and shutdown procedures;
- The operation, maintenance, and repair of the air pollution control device;
- Routine and periodic maintenance procedures, (Information to describe when it is necessary to change filter media shall be included in this section); and
- Upset conditions and corrective action procedures.

Records shall be maintained onsite to describe when maintenance and repair has been performed on each air pollution control device. At a minimum, the records shall include a description of the maintenance/repair action taken and the date the action was completed. The records shall be maintained in accordance with PTC General Provision 10.10 of this permit.

2.2 Opacity Limit

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

2.3 Visible Emissions Inspections

The permittee shall conduct quarterly facility-wide inspections 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. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

2.4 Reasonable Control of Fugitive Emissions

In accordance with IDAPA 58.01.01.650-651, all reasonable precautions shall be taken to prevent particulate matter from becoming airborne. Some of the reasonable precautions may include, but are not limited to:

- Application of Dust Suppressants: 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.
- Use of Control Equipment: 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 of Trucks: Covering, when practical, open bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving: Paving of roadways and their maintenance in a clean condition, where practical.

2.5 Fugitive Dust Inspections

The permittee shall conduct quarterly facility-wide inspections 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.

2.6 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution in accordance with IDAPA 58.01.01.776.01.

2.7 Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with the Odors permit condition. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date 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.

3 Wood/HDPE Extrusion Lines

3.1 Process Description

Blended wood/HDPE (high-density polyethylene) material is pneumatically conveyed from the blending systems to each extrusion line. Each extrusion process line starts by drying the blended mix first through two hot air dryers, then through a static desiccant dryer. Particulate emissions are vented from the hot air dryers to a baghouse dust collector. Particulate emissions controls implemented on the wood/HDPE extrusion line dryers are considered integral to reclaiming lost material which is reintroduced to the process as raw material. Dried material will then be processed through the extruder. The molten blend is forced through a mold, at which point it is water-cooled until it harden into its final shape. The hardened material is cut to a specified length of 8, 12, 16, or 24 feet by an enclosed reciprocating saw. If emissions generated by saw cutting are not adequately vented out of the enclosure, the mechanical saw equipment will become clogged and inoperable. For this reason, as well as reclamation, particulate emissions controls for the wood/HDPE extrusion line saws are integral to the process.

3.2 Control Device Descriptions

Table 3.1 Wood/HDPE Extrusion Lines Description

Emissions Units / Processes	Control Devices
Wood/HDPE Extrusion Lines 1 - 5	Baghouse Dust Collector (DC01)
Wood/HDPE Extrusion Lines 6 - 10	Baghouse Dust Collector (DC02)

Emission Limits

3.3 Emission Limits

The emissions from the wood/HDPE extrusion lines stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Wood/HDPE Extrusion Lines Emission Limits[a]

Source Description	$PM_{2.5}/PM_{10}$[b]		VOC	
	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]
Wood/HDPE Extrusion Line 1	0.0008	0.0037	0.063	0.28
Wood/HDPE Extrusion Line 2	0.0008	0.0037	0.063	0.28
Wood/HDPE Extrusion Line 3	0.0008	0.0037	0.063	0.28
Wood/HDPE Extrusion Line 4	0.0008	0.0037	0.063	0.28
Wood/HDPE Extrusion Line 5	0.0008	0.0037	0.063	0.28
Wood/HDPE Extrusion Line 6	0.0008	0.0037	0.063	0.28
Wood/HDPE Extrusion Line 7	0.0008	0.0037	0.063	0.28
Wood/HDPE Extrusion Line 8	0.0008	0.0037	0.063	0.28
Wood/HDPE Extrusion Line 9	0.0008	0.0037	0.063	0.28
Wood/HDPE Extrusion Line 10	0.0008	0.0037	0.063	0.28
Total	**0.008**	**0.037**	**0.63**	**2.8**

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) and ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
d) Tons per any consecutive 12-calendar month period.

Operating Requirements

3.4 Wood/HDPE Extrusion Line Throughput Limits

The wood/HDPE extrusion lines (1 through 10) combined shall not exceed 30,000 pounds per hour and 131,400 tons of throughput per any consecutive 12-month period.

3.5 Baghouse Requirements

The permittee shall install and operate baghouse dust collectors (DC01 and DC02) with a 99.98% PM_{10} and $PM_{2.5}$ control efficiency to control emissions from the ten wood/HDPE extrusion lines.

3.6 Pressure Drop Monitoring Device

The permittee shall install, calibrate, maintain, and operate, according to manufacturer's recommendations and specification, a pressure drop monitoring device to measure the pressure drop across the DC01 and DC02 baghouses while operating.

3.7 Operation of Air Pollution Control Equipment

When operating the wood/HDPE extrusion lines, the permittee shall operate the respective baghouse. Each of these air pollution control devices shall be operated according to manufacturer's recommendations and specification and in accordance with the O&M manual permit condition.

Monitoring and Recordkeeping Requirements

3.8 Wood/HDPE Extrusion Line Throughput Limits Monitoring

Each calendar day, the permittee shall monitor and record the throughput of each wood/HDPE extrusion line for the previous day in tons per day and the combined hourly throughput for all wood/HDPE extrusion lines in pounds per hour. Throughput of each wood/HDPE extrusion line shall be determined by summing the monthly operation over the previous consecutive 12-month period to demonstrate compliance with the Wood/HDPE Extrusion Line Throughput Limits permit condition.

3.9 Pressure Drop Monitoring Requirement

The permittee shall monitor and record the pressure drop across DC01 and DC02 baghouses once daily when operating to demonstrate compliance with the Operation of Air Pollution Control Equipment permit condition.

4 Wood/HDPE Blend Systems

4.1 Process Description

Wood/ high-density polyethylene (HDPE) materials from the respective silos are pneumatically conveyed to complex blending systems which mix the raw ingredients at the appropriate concentrations for extrusion into deck boards. Particulate emissions from the wood/HDPE material blending systems are vented to baghouse dust collectors. Particulate emissions controls implemented on the wood/HDPE blending systems are considered integral to reclaiming lost material which is reintroduced to the process as raw material.

4.2 Control Device Descriptions

Table 4.1 Wood/HDPE Blend Systems Description

Emissions Units / Processes	Control Devices
Wood Blend System 1	Baghouse Dust Collector (DC03)
Wood Blend System 2	Baghouse Dust Collector (DC04)
Wood Blend System 3	Baghouse Dust Collector (DC05)
Wood Blend System 4	Baghouse Dust Collector (DC06)

Emission Limits

4.3 Emission Limits

The emissions from the Wood/HDPE blend systems stack shall not exceed any corresponding emissions rate limits listed in Table 4.2.

Table 4.2 Wood/HDPE Blend Systems Emission Limits[a]

Source Description	$PM_{2.5}/PM_{10}$[b]	
	lb/hr [c]	T/yr [d]
Wood Blend System 1	0.0003	0.001
Wood Blend System 2	0.0003	0.001
Wood Blend System 3	0.0003	0.001
Wood Blend System 4	0.0003	0.001

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) and ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006
c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
d) Tons per any consecutive 12-calendar month period.

Operating Requirements

4.4 Wood Blend System Throughput Limits

The wood blend systems (1 through 4) combined shall not exceed 40,000 pounds per hour and 131,400 tons of throughput per any consecutive 12-month period.

4.5 Baghouse Requirements

The permittee shall install and operate baghouse dust collectors (DC03 – DC06) with a 99.9% PM_{10} and $PM_{2.5}$ control efficiency to control emissions from each of the four wood blend systems.

4.6 Pressure Drop Monitoring Device

The permittee shall install, calibrate, maintain, and operate, according to manufacturer's recommendations and specification, a pressure drop monitoring device to measure the pressure drop across each of the baghouses (DC03 through DC06) while operating.

4.7 Operation of Air Pollution Control Equipment

When operating the wood blend systems, the permittee shall operate the respective baghouse. Each of these air pollution control devices shall be operated according to manufacturer's recommendations and specification and in accordance with the O&M manual permit condition.

Monitoring and Recordkeeping Requirements

4.8 Wood Blend System Throughput Limits Monitoring

Each calendar day, the permittee shall monitor and record the throughput of each wood blend system for the previous day in pounds per hour and tons per day. Throughput of each wood blend system shall be determined by summing the monthly operation over the previous consecutive 12-month period to demonstrate compliance with the Wood Blend System Throughput Limits permit condition.

4.9 Pressure Drop Monitoring Requirement

The permittee shall monitor and record the pressure drop across each of the baghouses (DC03 through DC06) once daily when operating to demonstrate compliance with the Operation of Air Pollution Control Equipment permit condition.

5 PVC Extrusion Lines

5.1 Process Description

Blended PVC material is pneumatically conveyed to each extrusion line. Brabender feeder systems convey raw material into the extruders at each extrusion line. Particulate emissions from all the feeders vent to a single baghouse dust collector. Particulate emissions controls implemented on the PVC feeder system are considered integral to reclaiming lost material which is reintroduced to the process as raw material.

Blended material will then be processed through the extruder. The molten blend is forced through a mold, at which point it is cooled until it hardens into its final shape. The PVC extrusion process generates VOC emissions. These emissions will not be controlled, but will vent from the building through powered roof exhausts.

The hardened material is cut to a specified length by an enclosed heat knife. No appreciable VOC emissions are generated from the heat knife due to its low operating temperature relative to extrusion.

5.2 Control Device Descriptions

Table 5.1 PVC Extrusion Lines Description

Emissions Units / Processes	Control Devices
PVC Extrusion Lines 1-5	Baghouse Dust Collector (DC07)
PVC Extrusion Lines 6-10	

Emission Limits

5.3 Emission Limits

The emissions from the PVC extrusion lines stack shall not exceed any corresponding emissions rate limits listed in Table 5.2.

Table 5.2 PVC Extrusion Lines Emission Limits[a]

Source Description	$PM_{2.5}/PM_{10}$[b]		VOC	
	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]
PVC Extrusion Line 1	0.00015	0.00067	0.12	0.51
PVC Extrusion Line 2	0.00015	0.00067	0.12	0.51
PVC Extrusion Line 3	0.00015	0.00067	0.12	0.51
PVC Extrusion Line 4	0.00015	0.00067	0.12	0.51
PVC Extrusion Line 5	0.00015	0.00067	0.12	0.51
PVC Extrusion Line 6	0.00015	0.00067	0.12	0.51
PVC Extrusion Line 7	0.00015	0.00067	0.12	0.51
PVC Extrusion Line 8	0.00015	0.00067	0.12	0.51
PVC Extrusion Line 9	0.00015	0.00067	0.12	0.51
PVC Extrusion Line 10	0.00015	0.00067	0.12	0.51
Total	**0.0015**	**0.0067**	**1.2**	**5.1**

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) and ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006
c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
d) Tons per any consecutive 12-calendar month period.

Operating Requirements

5.4 PVC Extrusion Lines Throughput Limits

The PVC extrusion lines (1 through 10) combined shall not exceed 18,500 pounds per hour and 81,030 tons of throughput per any consecutive 12-month period.

5.5 Baghouse Requirements

The permittee shall install and operate baghouse dust collector (DC07) with a 99.99% PM_{10} and $PM_{2.5}$ control efficiency to control emissions from each of the PVC extrusion lines.

5.6 Pressure Drop Monitoring Device

The permittee shall install, calibrate, maintain, and operate, according to manufacturer's recommendations and specification, a pressure drop monitoring device to measure the pressure drop across the DC07 baghouse while operating.

5.7 Operation of Air Pollution Control Equipment

When operating the PCV extrusion lines, the permittee shall operate the baghouse. The air pollution control device shall be operated according to manufacturer's recommendations and specification and in accordance with the O&M manual permit condition.

Monitoring and Recordkeeping Requirements

5.8 PVC Extrusion Lines Throughput Limits Monitoring

Each calendar day, the permittee shall monitor and record the throughput of each PVC extrusion line for the previous day in tons per day and the combined hourly throughput for all PVC extrusion lines in pounds per hour. Throughput of each PVC extrusion line shall be determined by summing the monthly operation over the previous consecutive 12-month period to demonstrate compliance with the PVC Extrusion Lines Throughput Limits permit condition.

5.9 Pressure Drop Monitoring Requirement

The permittee shall monitor and record the pressure drop across the DC07 baghouse once daily when operating to demonstrate compliance with the Operation of Air Pollution Control Equipment permit condition.

6 Wood/PVC Regrind Systems

6.1 Process Description

Waste product is occasionally generated during startup and shutdown of the line, or when there is a malfunction or testing in one of the extrusion process lines. This material is stockpiled with like material and eventually reground to be reintroduced into the process as raw material. Wood/HDPE and PVC waste materials are ground separately and pneumatically conveyed to the appropriate storage silo from the grinder. Particulate emissions generated from each grinder are vented to separate baghouse dust collectors. Particulate emissions controls implemented on the grinders are considered integral to reclaiming lost material which is reintroduced to the process as raw material.

6.2 Control Device Descriptions

Table 6.1 Wood/PVC Regrind Systems Description

Emissions Units / Processes	Control Devices
Wood Regrind	Baghouse Dust Collector (DC08)
PVC Regrind	Baghouse Dust Collector (DC09)

Emission Limits

6.3 Emission Limits

The emissions from the Wood/PVC regrind systems stack shall not exceed any corresponding emissions rate limits listed in Table 6.2.

Table 6.2 Wood/PVC Regrind Systems Emission Limits[a]

Source Description	$PM_{2.5}/PM_{10}$[b]	
	lb/hr [c]	T/yr [d]
Wood Regrind	0.0004	0.0016
PVC Regrind	0.0008	0.0035

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) and ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
d) Tons per any consecutive 12-calendar month period.

Operating Requirements

6.4 Baghouse Requirements

The permittee shall install and operate baghouse dust collectors (DC08 and DC09) with a 99.9% PM_{10} and $PM_{2.5}$ control efficiency to control emissions from the wood and PVC regrind systems.

6.5 Pressure Drop Monitoring Device

The permittee shall install, calibrate, maintain, and operate, according to manufacturer's recommendations and specification, a pressure drop monitoring device to measure the pressure drop across the DC08 and DC09 baghouses while operating.

6.6 Operation of Air Pollution Control Equipment

When operating the wood and/or PVC regrind systems, the permittee shall operate the respective baghouses. The air pollution control devices shall be operated according to manufacturer's recommendations and specification and in accordance with the O&M manual permit condition.

Monitoring and Recordkeeping Requirements

6.7 Wood/PVC Regrind Systems Emission Limits Monitoring

Each calendar day, the permittee shall monitor and record the total dust collected by baghouse dust collectors DC08 and DC09 for the previous day in pounds per day to demonstrate compliance with the Wood/PVC Regrind Systems Emission Limits permit condition. Based on hourly emission limits in the Wood/PVC Regrind Systems Emission Limits permit condition, the particulate emissions collected at DC08 shall not exceed 9.6 pounds per day and 1.6 tons per year on a consecutive 12-month rolling basis. The particulate emissions collected at DC09 shall not exceed 19.2 pounds per day and 3.5 tons per year on a consecutive 12-month rolling basis.

6.8 Pressure Drop Monitoring Requirement

The permittee shall monitor and record the pressure drop across the DC08 and DC09 baghouses once daily when operating to demonstrate compliance with the Operation of Air Pollution Control Equipment permit condition.

7 Pulverizers

7.1 Process Description

Recycled HDPE and low-density polyethylene (LDPE) plastics are loaded into one of six pulverizers, reducing the material to approximately ¼ inch flakes. The pulverized mixture is pneumatically conveyed to the appropriate storage silo for use as raw material. Particulate emissions from the pulverizers are vented to a single baghouse dust collector. Particulate emissions controls implemented on the pulverizers are considered integral to reclaiming lost material which is reintroduced to the process as raw material.

7.2 Control Device Descriptions

Table 7.1 Pulverizers Description

Emissions Units / Processes	Control Devices
Pulverizers 1 - 6	Baghouse Dust Collector (DC11)

Emission Limits

7.3 Emission Limits

The emissions from the pulverizers stack shall not exceed any corresponding emissions rate limits listed in Table 7.2.

Table 7.2 Pulverizers Emission Limits[a]

Source Description	$PM_{2.5}/PM_{10}$[b]	
	lb/hr [c]	T/yr [d]
Pulverizer 1	0.0007	0.0029
Pulverizer 2	0.0007	0.0029
Pulverizer 3	0.0007	0.0029
Pulverizer 4	0.0007	0.0029
Pulverizer 5	0.0007	0.0029
Pulverizer 6	0.0007	0.0029

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) and ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
d) Tons per any consecutive 12-calendar month period.

Operating Requirements

7.4 Pulverizers Throughput Limits

The pulverizers (1 through 6) combined shall not exceed 19,800 pounds per hour and 86,724 tons of throughput per any consecutive 12-month period.

7.5 Baghouse Requirements

The permittee shall install and operate baghouse dust collector (DC11) with a 99.98% PM_{10} and $PM_{2.5}$ control efficiency to control emissions from each of the pulverizers.

7.6 Pressure Drop Monitoring Device

The permittee shall install, calibrate, maintain, and operate, according to manufacturer's recommendations and specification, a pressure drop monitoring device to measure the pressure drop across the DC11 baghouse while operating.

7.7 Operation of Air Pollution Control Equipment

When operating the pulverizers, the permittee shall operate the baghouse. The air pollution control device shall be operated according to manufacturer's recommendations and specification and in accordance with the O&M manual permit condition.

Monitoring and Recordkeeping Requirements

7.8 Pulverizers Throughput Limits Monitoring

Each calendar day, the permittee shall monitor and record the throughput of each pulverizer for the previous day in pounds per hour and tons per day. Throughput of each pulverizer shall be determined by summing the monthly operation over the previous consecutive 12-month period to demonstrate compliance with the Pulverizer Throughput Limits permit condition.

7.9 Pressure Drop Monitoring Requirement

The permittee shall monitor and record the pressure drop across the DC11 baghouse once daily when operating to demonstrate compliance with the Operation of Air Pollution Control Equipment permit condition.

8 Truck House

8.1 Process Description

Particulate emissions are generated from the Truck House when wood flour is unloaded from over-the-road trucks. Particulate emissions from the Truck House vent intermittently to a baghouse dust collector.

8.2 Control Device Descriptions

Table 8.1 Truck House Description

Emissions Units / Processes	Control Devices
Truck House	Baghouse Dust Collector (DC10)

Emission Limits

8.3 Emission Limits

The emissions from the truck house stack shall not exceed any corresponding emissions rate limits listed in Table 8.2.

Table 8.2 Truck House Emission Limits[a]

Source Description	$PM_{2.5}/PM_{10}$[b]	
	lb/hr [c]	T/yr [d]
Truck House	0.0002	0.0002

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) and ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006
c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
d) Tons per any consecutive 12-calendar month period.

Operating Requirements

8.4 Truck House Throughput Limits

The truck house shall not exceed 60,000 pounds per hour and 59,154 tons of throughput per any consecutive 12-month period.

8.5 Baghouse Requirements

The permittee shall install and operate baghouse dust collector (DC10) with a 99.98% PM_{10} and $PM_{2.5}$ control efficiency to control emissions from the truck house.

8.6 Pressure Drop Monitoring Device

The permittee shall install, calibrate, maintain, and operate, according to manufacturer's recommendations and specification, a pressure drop monitoring device to measure the pressure drop across the DC10 baghouse while operating.

8.7 Operation of Air Pollution Control Equipment

When wood flour is unloaded in the truck house, the permittee shall operate the baghouse. The air pollution control device shall be operated according to manufacturer's recommendations and specification and in accordance with the O&M manual permit condition.

Monitoring and Recordkeeping Requirements

8.8 Truck House Throughput Limits Monitoring

Each calendar day, the permittee shall monitor and record the throughput of the truck house for the previous day in pounds per hour and tons per day. Throughput of the truck house shall be determined by summing the monthly operation over the previous consecutive 12-month period to demonstrate compliance with the Truck House Throughput Limits permit condition.

8.9 Pressure Drop Monitoring Requirement

The permittee shall monitor and record the pressure drop across the DC10 baghouse once daily when operating to demonstrate compliance with the Operation of Air Pollution Control Equipment permit condition.

9 Pellet Mills

9.1 Process Description

Blended wood/HDPE material is pneumatically conveyed from the blending systems to one of six pellet mills. Pellet mills compress blended raw material into pellets at low heat relative to extrusion, improving extrusion efficiency. Once the pellets have been formed, they are air-cooled in pellet mill coolers. This air is exhausted through a filtered cyclone separator which reintroduces collected particulates to the pellet mill. The filtered cyclone for each pellet mill is considered integral to reclaiming material. Cooled pellets are pneumatically conveyed to the wood/HDPE extrusion lines.

9.2 Control Device Descriptions

Table 9.1 Pellet Mills Description

Emissions Units / Processes	Control Devices
Pellet Mill 1	Filtered Cyclone (CS01)
Pellet Mill 2	Filtered Cyclone (CS02)
Pellet Mill 3	Filtered Cyclone (CS03)
Pellet Mill 4	Filtered Cyclone (CS04)
Pellet Mill 5	Filtered Cyclone (CS05)
Pellet Mill 6	Filtered Cyclone (CS06)

Emission Limits

9.3 Emission Limits

The emissions from the pellet mills stack shall not exceed any corresponding emissions rate limits listed in Table 9.2.

Table 9.2 Pellet Mills Emission Limits[a]

Source Description	$PM_{2.5}/PM_{10}$[b]	
	lb/hr [c]	T/yr [d]
Pellet Mill 1	0.0096	0.026
Pellet Mill 2	0.0096	0.026
Pellet Mill 3	0.0096	0.026
Pellet Mill 4	0.0096	0.026
Pellet Mill 5	0.0096	0.026
Pellet Mill 6	0.0096	0.026
Total	**0.058**	**0.16**

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) and ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006
c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
d) Tons per any consecutive 12-calendar month period.

Operating Requirements

9.4 Pellet Mills Throughput Limits

The Pellet Mills (1 through 6) combined shall not exceed 48,000 pounds per hour and 131,400 tons of throughput per any consecutive 12-month period.

9.5 Filtered Cyclone Requirements

The permittee shall install and operate filtered cyclones (CS01 – CS06) with a 99% PM_{10} and $PM_{2.5}$ control efficiency to control emissions from each of the pellet mills.

9.6 Pressure Drop Monitoring Device

The permittee shall install, calibrate, maintain, and operate, according to manufacturer's recommendations and specification, a pressure drop monitoring device to measure the pressure drop across each of the filtered cyclones (CS01 through CS06) while operating.

9.7 Operation of Air Pollution Control Equipment

When operating the pellet mills, the permittee shall operate the filtered cyclones. The air pollution control device shall be operated according to manufacturer's recommendations and specification and in accordance with the O&M manual permit condition.

Monitoring and Recordkeeping Requirements

9.8 Pellet Mills Throughput Limits Monitoring

Each calendar day, the permittee shall monitor and record the throughput of each pellet mill for the previous day in tons per day and the combined hourly throughput for all pellet mills in pounds per hour. Throughput of each pellet mill shall be determined by summing the monthly operation over the previous consecutive 12-month period to demonstrate compliance with the Pellet Mills Throughput Limits permit condition.

9.9 Pressure Drop Monitoring Requirement

The permittee shall monitor and record the pressure drop across the each of the filtered cyclones (CS01 through CS06) once daily when operating to demonstrate compliance with the Operation of Air Pollution Control Equipment permit condition.

10 Storage Silos

10.1 Process Description

Particulate emissions are generated from the storage silos when material is loaded into the silos. Emissions from the storage silos will vent intermittently to bin vents located on top of each silo. The bin vents are not equipped with blowers or fans and therefore emissions only occur while the silos are being loaded.

10.2 Control Device Descriptions

Table 10.1 Storage Silos Description

Emissions Units / Processes	Control Devices
Wood Storage Silos 1 - 12	Bin Vents (BV15 – BV26)
PVC Storage Silos 1 - 14	Bin Vents (BV01 – BV14)

Emission Limits

10.3 Emission Limits

The emissions from the storage silos stacks shall not exceed any corresponding emissions rate limits listed in Table 10.2.

Table 10.2 Storage Silos Emission Limits[a]

Source Description	$PM_{2.5}/PM_{10}$[b]	
	lb/hr [c]	T/yr [d]
PVC Storage Silos 1 - 14	0.144	0.033
Wood Storage Silos 1 & 2 (18 foot diameter)	0.0096	0.0047
Wood Storage Silos 3 – 12 (14 foot diameter)	0.019	0.006

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) and ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006
c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
d) Tons per any consecutive 12-calendar month period.

Operating Requirements

10.4 PVC Storage Silos Throughput Limits

The PVC storage silos 1 through 14 combined shall not exceed 360,300 pounds per hour and 82,420 tons of throughput per any consecutive 12-month period.

10.5 Wood Storage Silos Throughput Limits

The wood storage silos 1 and 2 combined with the 18 foot diameter shall not exceed 120,000 pounds per hour and 59,154 tons of throughput per any consecutive 12-month period.

The wood storage silos 3 through 12 combined with the 14 foot diameter shall not exceed 240,000 pounds per hour and 73,216 tons of throughput per any consecutive 12-month period.

10.6 Bin Vent Requirements

The permittee shall install bin vents on each storage silo to control emissions from the storage silos.

Monitoring and Recordkeeping Requirements

10.7 PVC Storage Silos Throughput Limits Monitoring

Each calendar day, the permittee shall monitor and record the throughput of the PVC storage silos for the previous day in pounds per hour and tons per day. Throughput of the PVC storage silos shall be determined by summing the monthly operation over the previous consecutive 12-month period to demonstrate compliance with the PVC Storage Silos Throughput Limits permit condition.

10.8 Wood Storage Silos Throughput Limits Monitoring

Each calendar day, the permittee shall monitor and record the throughput of the wood storage silos for the previous day in pounds per hour and tons per day. Throughput of the wood storage silos shall be determined by summing the monthly operation over the previous consecutive 12-month period to demonstrate compliance with the Wood Storage Silos Throughput Limits permit condition.

11 General Provisions

General Compliance

11.1 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.]

11.2 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]

11.3 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

11.4 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

11.5 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]

11.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and

- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/1994]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/1994]

Performance Testing

11.7 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.

11.8 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.

11.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/2000 and 4/11/2015]

Monitoring and Recordkeeping

11.10 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

11.11 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

11.12 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

11.13 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

11.14 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

11.15 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

11.16 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]