**AIR QUALITY**

**TIER I OPERATING PERMIT**

<table>
<thead>
<tr>
<th>Permittee</th>
<th>Bennett Lumber Products</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permit Number</td>
<td>T1-2021.0045</td>
</tr>
<tr>
<td>Project ID</td>
<td>62701</td>
</tr>
<tr>
<td>Facility ID</td>
<td>057-00008</td>
</tr>
<tr>
<td>Facility Location</td>
<td>3759 Highway 6</td>
</tr>
<tr>
<td></td>
<td>Princeton, Idaho 83857</td>
</tr>
</tbody>
</table>

**Facility Location**

3759 Highway 6
Princeton, Idaho 83857

**Permit Authority**

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules) (IDAPA 58.01.01.300–386) (b) incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210 and the permittee elects not to incorporate those terms and conditions into this operating permit.

The permittee shall comply with the terms and conditions of this permit. The effective date of this permit is the date of signature by DEQ on this cover page.

**Date Issued** Draft for Public Comment

**Date Expires** DRAFT XX, 2027

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Shawnee Chen, PE, Permit Writer

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Mike Simon, Stationary Source Bureau Chief
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1. Acronyms, Units, and Chemical Nomenclature

- acfm: actual cubic feet per minute
- AP-42: Compilation of Air Emissions Factors | US EPA
- ASTM: American Society for Testing and Materials
- CAM: Compliance Assurance Monitoring
- cfm: cubic feet per minute
- CFR: Code of Federal Regulations
- CO: carbon monoxide
- COMS: continuous opacity monitoring systems
- °F: degrees Fahrenheit
- DEQ: Idaho Department of Environmental Quality
- dscf: dry standard cubic feet
- EPA: United States Environmental Protection Agency
- FHI: fuel heat input to steam output ratio
- gr: grains (1 lb = 7,000 grains)
- gr/dscf: grains per dry standard cubic foot
- HAP: hazardous air pollutants
- hp: horsepower
- hr/yr: hours per consecutive 12-calendar-month period
- ICE: internal combustion engines
- IDAPA: a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
- lb/hr: pounds per hour
- MRRR: Monitoring, Recordkeeping and Reporting Requirements
- NESHAP: National Emission Standards for Hazardous Air Pollutants
- NO₂: nitrogen dioxide
- NOx: nitrogen oxides
- NSPS: New Source Performance Standards
- PM: particulate matter
- PM₂.₅: particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
- PM₁₀: particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
- PTC: permit to construct
- PTE: potential to emit
- PW: process weight rate
- RICE: reciprocating internal combustion engines
- Rules: Rules for the Control of Air Pollution in Idaho
- SIP: State Implementation Plan
- SO₂: sulfur dioxide
- SOx: sulfur oxides
- T/day: tons per calendar day
- T/hr: tons per hour
- T/mo: tons per calendar month
- T/yr: tons per consecutive 12-calendar-month period
- T1: Tier I operating permit
- ULSD: ultra-low sulfur diesel
- VOC: volatile organic compound
2. Permit Scope

Purpose

2.1 This Tier I operating permit establishes facility-wide requirements in accordance with the Idaho State Implementation Plan control strategy and the Rules. This project is the renewal of the facility’s existing Tier I operating permit.

2.2 This Tier I operating permit incorporates the following permit(s):

- Permit to Construct No. P-2007.0107, issued XX XX, 2022

2.3 This Tier I operating permit replaces the following permit(s):

- Tier I Operating Permit No. T1-2014.0031, issued March 23, 2017

Regulated Sources

Table 2.1 lists all sources of emissions regulated in this permit.

<table>
<thead>
<tr>
<th>Permit Section</th>
<th>Source Description</th>
<th>Emissions Control(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>Zurn Industries hog-fuel boiler: Type C, rated at 60,000 pound per hour saturated steam; installed 1978</td>
<td>Zurn Industries multiclone followed by Zurn wet scrubber with cyclone separator</td>
</tr>
<tr>
<td></td>
<td>Dry kilns No. 1 and No. 2: Manufacturer: Moore Length: 73 feet Design: Double track Installed June 1972 and June 1964</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Dry Kiln No. 3: Manufacturer: Lumber systems Inc Length: 73 feet Design: Single track Installed: March 1984</td>
<td>None</td>
</tr>
<tr>
<td>5</td>
<td>Dry Kilns No. 4, No. 5, and No. 6: Manufacturer: Lumber systems Inc Length: 73 feet Design: Double track Installed: June 1977, June 1977, and January 1989, respectively</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Dry Kiln No. 7 Manufacturer: Wellons Length: 73 feet Design: Double track Installed: October 2005</td>
<td>None</td>
</tr>
<tr>
<td>Permit Section</td>
<td>Source Description</td>
<td>Emissions Control(s)</td>
</tr>
<tr>
<td>----------------</td>
<td>---------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>6</td>
<td>Woodworking Equipment</td>
<td>Sawdust Cyclone P7</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Shavings Cyclone P11</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Shavings Cyclone P12</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Shavings Cyclone P13</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Shavings Cyclone P14</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Sawdust Cyclone P21</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Baghouse P24</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Baghouse Cyclone P6</td>
</tr>
<tr>
<td>7</td>
<td>Emergency compression ignition engine (Emergency Generator Engine)</td>
<td>None</td>
</tr>
<tr>
<td></td>
<td>Manufacturer: John Deere</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Model: 6081AF001</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Rated Capacity: 270 hp</td>
<td></td>
</tr>
</tbody>
</table>
3. Facility-Wide Conditions

Table 3.1 contains a summary of requirements that apply generally to emissions units at the facility.

<table>
<thead>
<tr>
<th>Permit Conditions</th>
<th>Parameter</th>
<th>Limit / Standard Summary</th>
<th>Applicable Requirements Reference</th>
<th>Monitoring, Recordkeeping, and Reporting Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1-3.4</td>
<td>Fugitive Dust</td>
<td>Reasonable control</td>
<td>IDAPA 58.01.01.650–651</td>
<td>3.2 - 3.4, 3.22, 3.27</td>
</tr>
<tr>
<td>3.5, 3.6</td>
<td>Odors</td>
<td>Reasonable control</td>
<td>IDAPA 58.01.01.775–776</td>
<td>3.6, 3.22, 3.27</td>
</tr>
<tr>
<td>3.7-3.9</td>
<td>Visible Emissions</td>
<td>20% opacity for no more than 3 minutes in any 60-minute period</td>
<td>IDAPA 58.01.01.625</td>
<td>3.8, 3.9, 3.22, 3.27</td>
</tr>
<tr>
<td>3.10–3.14</td>
<td>Excess Emissions</td>
<td>Compliance with IDAPA 58.01.01.130-136</td>
<td>IDAPA 58.01.01.130–136</td>
<td>3.10–3.14, 3.22, 3.27</td>
</tr>
<tr>
<td>3.15, 3.16</td>
<td>Sulfur Content</td>
<td>ASTM grade No. 1 fuel oil ≤ 0.3% by weight</td>
<td>IDAPA 58.01.01.725</td>
<td>3.16, 3.22, 3.27</td>
</tr>
<tr>
<td>3.17</td>
<td>Open Burning</td>
<td>Compliance with IDAPA 58.01.01.600-623</td>
<td>IDAPA 58.01.01.600–624</td>
<td>3.17, 3.22, 3.27</td>
</tr>
<tr>
<td>3.18</td>
<td>Asbestos</td>
<td>Compliance with 40 CFR 61, Subpart M</td>
<td>40 CFR 61, Subpart M</td>
<td>3.18, 3.22, 3.27</td>
</tr>
<tr>
<td>3.20</td>
<td>Recycling and Emissions Reductions</td>
<td>Compliance with 40 CFR 82, Subpart F</td>
<td>40 CFR 82, Subpart F</td>
<td>3.20, 3.22, 3.27</td>
</tr>
<tr>
<td>3.21</td>
<td>NSPS/NESHAP General Provisions</td>
<td>Compliance with 40 CFR 63, Subpart A</td>
<td>IDAPA 58.01.01.107.03</td>
<td>3.21, 3.22, 3.27</td>
</tr>
<tr>
<td>3.22</td>
<td>Monitoring and Recordkeeping</td>
<td>Maintenance of required records</td>
<td>IDAPA 58.01.01.322.06</td>
<td>3.22, 3.27</td>
</tr>
<tr>
<td>3.23–3.26</td>
<td>Testing</td>
<td>Compliance testing</td>
<td>IDAPA 58.01.01.157</td>
<td>3.22, 3.23-3.26, 3.27</td>
</tr>
<tr>
<td>3.27</td>
<td>Reports and Certifications</td>
<td>Submittal of required reports, notifications, and certifications</td>
<td>IDAPA 58.01.01.322.08</td>
<td>3.27</td>
</tr>
<tr>
<td>3.28</td>
<td>Incorporation of Federal Requirements by Reference</td>
<td>Compliance with applicable federal requirements referenced</td>
<td>IDAPA 58.01.01.107</td>
<td>3.22, 3.27, 3.28</td>
</tr>
<tr>
<td>3.29</td>
<td>Facility-wide HAP Limits</td>
<td>9.49 T/yr for any one HAP; 24.49 T/yr for all HAP combined</td>
<td>P-2007.0107</td>
<td>3.22, 3.30, 4.10, 5.9</td>
</tr>
</tbody>
</table>
Fugitive Dust

3.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651]

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

[IDAPA 58.01.01.322.06, 07]

3.3 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 was taken.

[IDAPA 58.01.01.322.06, 07]

3.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust 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 quarterly fugitive dust 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 dust emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07]

Odors

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

[IDAPA 58.01.01.775–776 (State-only)]

3.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description 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.

[IDAPA 58.01.01.322.06, 07 (State-only)]

Visible Emissions

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

[IDAPA 58.01.01.625]
3.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) 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%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.

[IDAPA 58.01.01.322.06]

3.9 The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee’s assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.07]

Excess Emissions

Excess Emissions—General

3.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions. The provisions of IDAPA 58.01.01.130–136 shall govern in the event of conflicts between the excess emissions facility wide conditions (Permit Conditions 3.10 through 3.14) and the regulations of IDAPA 58.01.01.130–136.

During an excess emissions event, the permittee shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132]
**Excess Emissions—Startup, Shutdown, and Scheduled Maintenance**

3.11 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

- Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.
- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the event, unless the permittee demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
- Reporting and recording the information required pursuant to the excess emissions reporting and recordkeeping requirements (Permit Conditions 3.13 and 3.14) and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

(IDAPA 58.01.01.133)

**Excess Emissions—Upset, Breakdown, or Safety Measures**

3.12 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

- Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
- Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
- Report and record the information required pursuant to the excess emissions reporting and recordkeeping requirements (Permit Conditions 3.13 and 3.14) and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
- During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

(IDAPA 58.01.01.134)

**Excess Emissions—Reporting and Recordkeeping**

3.13 The permittee shall submit a written report to DEQ for each excess emissions event, no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

(IDAPA 58.01.01.135)
3.14 The permittee shall maintain excess emissions records at the facility for the most recent five calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

- An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and
- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the permittee in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136]

**Sulfur Content**

3.15 The permittee shall not sell, distribute, use, or make available for use any of the following:

- Distillate fuel oil containing more than the following percentages of sulfur:
  - ASTM Grade 1 fuel oil, 0.3% by weight
  - ASTM Grade 2 fuel oil, 0.5% by weight
- DEQ may approve an exemption from these fuel sulfur content requirements (IDAPA 58.01.01.725.01-725.04) if the permittee demonstrates that, through control measures or other means, SO₂ emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725]

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

[IDAPA 58.01.01.322.07]

**Open Burning**

3.17 The permittee shall comply with the “Rules for Control of Open Burning” (IDAPA 58.01.01.600–623).

[IDAPA 58.01.01.600–624]

**Asbestos**

3.18 NESHAP 40 CFR 61, Subpart M—National Emission Standard for Asbestos

The permittee shall comply with all applicable emissions standards pursuant to 40 CFR 61, Subpart M—“National Emission Standard for Asbestos.”

[40 CFR 61, Subpart M]
**Accidental Release Prevention**

3.19 A permittee of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the “Chemical Accident Prevention Provisions” at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process

[40 CFR 68.10(a)]

**Recycling and Emissions Reductions**

3.20 **40 CFR Part 82—Protection of Stratospheric Ozone**

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, “Recycling and Emissions Reduction.”

[40 CFR 82, Subpart F]

**NSPS/NESHAP General Provisions**

3.21 **NESHAP 40 CFR 63, Subpart A—General Provisions**

The permittee shall comply with the requirements of 40 CFR 63, Subpart A - “General Provisions.” A summary of applicable requirements for affected sources is provided in Table 3.2.
### Table 3.2 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources

<table>
<thead>
<tr>
<th>Section</th>
<th>Subject</th>
<th>Summary of Section Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>63.13</td>
<td>Address</td>
<td>All requests, reports, applications, submittals, and other communications associated with 40 CFR 63, Subpart(s) shall be submitted to: Director, Office of Air Quality Lewiston Regional Office US EPA 1118 &quot;F&quot; St. 1200 Sixth Ave. Lewiston, ID 83501 Seattle, WA 98101</td>
</tr>
<tr>
<td>63.4(a)</td>
<td>Prohibited Activities</td>
<td>No permittee must operate any affected source in violation of the requirements of 40 CFR 63 in accordance with 40 CFR 63.4(a). No permittee subject to the provisions of this part shall fail to keep records, notify, report, or revise reports as required under this part.</td>
</tr>
<tr>
<td>63.4(b)</td>
<td>Circumvention/Fragmentation</td>
<td>No permittee shall build, erect, install or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. Fragmentation which divides ownership of an operation, within the same facility among various owners where there is no real change in control, will not affect applicability in accordance with 40 CFR 63.4(c).</td>
</tr>
</tbody>
</table>
| 63.6(b) and (c) | Compliance Dates | The permittee of any new or reconstructed source must comply with the relevant standard as specified in 40 CFR 63.6(b).  
  -  The permittee of a source that has an initial startup before the effective date of a relevant standard must comply not later than the standard's effective date in accordance with 40 CFR 63.6(b)(1).  
  -  The permittee of a source that has an initial startup after the effective date of a relevant standard must comply upon startup of the source in accordance with 40 CFR 63.6(b)(2).  
  -  The permittee of any existing sources must comply with the relevant standard by the compliance date established in the applicable subpart or as specified in 40 CFR 63.6(c).  
  -  The permittee of an area source that increases its emissions of hazardous air pollutants such that the source becomes a major source shall be subject to relevant standards for existing sources in accordance with 40 CFR 63.6(c)(5). |
| 63.6(e) and (f) | Compliance with Standards and Maintenance Requirements (Non-Opacity) | At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions in accordance with 40 CFR 63.6(e).  
  -  The permittee of an affected source must develop a written startup, shutdown, and malfunction plan and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard in accordance with 40 CFR 63.6(c). The permittee must maintain the current plan at the affected source and must make the plan available upon request. If the plan fails to address or inadequately addresses a malfunction, the permittee must revise the plan within 45 days after the event.  
  -  The permittee must record and report actions taken during a startup, shutdown, or malfunction in accordance with the requirements in 40 CFR 63.6(e). The permittee shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the plan in the semiannual startup, shutdown, and malfunction report.  
  -  Non-opacity emission standards shall apply at all times except during periods of startup, shutdown, and malfunction, and as otherwise specified, in accordance with 40 CFR 63.6(f). |
<table>
<thead>
<tr>
<th>Section</th>
<th>Subject</th>
<th>Summary of Section Requirements</th>
</tr>
</thead>
</table>
| 63.7    | Performance Testing Requirements | - If required to do performance testing, the permittee must perform such tests within 180 days of the compliance date in accordance with 40 CFR 63.7(a).  
- The permittee must notify in writing of the intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin to allow review of the site-specific test plan and to have an observer present during the test in accordance with 40 CFR 63.7(b).  
- Before conducting a required performance test, the permittee shall develop and, if requested, shall submit a site-specific test plan for approval in accordance with 40 CFR 63.7(c). The test plan shall include a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program.  
- If required to do performance testing, the permittee shall provide performance testing facilities in accordance with 40 CFR 63.7(d):  
  o Sampling ports adequate for test methods applicable to such source.  
  o Safe sampling platform(s);  
  o Safe access to sampling platform(s);  
  o Utilities for sampling and testing equipment; and  
  o Any other facilities deemed necessary for safe and adequate testing of a source.  
- Performance tests shall be conducted and data reduced in accordance with 40 CFR 63.7(e) and (f).  
- The permittee shall report the results of the performance test before the close of business on the 60th day following the completion of the test, unless specified or approved otherwise in accordance with 40 CFR 63.7(g). |
| 63.9    | Notification Requirements | - The permittee of an affected source that has an initial startup before the effective date of a relevant standard shall notify in writing that the source is subject to the relevant standard, in accordance with 40 CFR 63.9(b)(2). The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information:  
  o The name and address of the permittee;  
  o The address (i.e., physical location) of the affected source;  
  o An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;  
  o A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and  
  o A statement of whether the affected source is a major source or an area source.  
- The permittee of a new or reconstructed major affected source for which an application for approval of construction or reconstruction is required must provide the following information in writing in accordance with 40 CFR 63.9(b)(4):  
  o A notification of intention to construct a new major-emitting affected source, reconstruct a major-emitting affected source, or reconstruct a major source such that the source becomes a major-emitting affected source;  
  o A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date.  
- The permittee of a new or reconstructed affected source for which an application for approval of construction or reconstruction is not required must provide the following information in writing in accordance with 40 CFR 63.9(b)(5):  
  o A notification of intention to construct a new affected source, reconstruct an affected source, or reconstruct a source such that the source becomes an affected source, and  
  o A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date.  
  o Unless the permittee has requested and received prior permission, the notification must include the information required in the application for approval of construction or reconstruction as specified in 40 CFR 63.5(d)(1). |
<table>
<thead>
<tr>
<th>Section</th>
<th>Subject</th>
<th>Summary of Section Requirements</th>
</tr>
</thead>
</table>
| 63.9    | Notification Requirements (continued) | • The permittee shall notify in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin to allow the opportunity to review and approve the site-specific test plan required by 40 CFR 63.7(c), and to have an observer present during the test.  
• The permittee of an affected source shall notify in writing of the anticipated date for conducting the opacity or visible emission observations in accordance with 40 CFR 63.9(f), if such observations are required.  
• Each time a notification of compliance status is required under this part, the permittee of such source shall submit a notification of compliance status in accordance with 40 CFR 63.9(h)(2)(i). The notification shall list:  
  o The methods that were used to determine compliance;  
  o The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;  
  o The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods;  
  o The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard;  
  o If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification);  
  o A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and  
  o A statement by the permittee of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements.  
• The notification must be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard unless otherwise specified in accordance with 40 CFR 63.9(h)(2)(ii). If no performance test is required but opacity or visible emission observations are required to demonstrate compliance with a standard, the notification shall be sent before close of business on the 30th day following the completion of the observations.  
• Each time a notification of compliance status is required under this part, the permittee of such source shall submit the notification of compliance status following completion of the relevant compliance demonstration activity specified.  
• If a permittee submits estimates or preliminary information in an application in place of the actual emissions data or control efficiencies, the permittee shall submit the actual emissions data and other correct information as soon as available but no later than with the initial notification of compliance status required in this section in accordance with 40 CFR 63.9(h)(5).  
• Any change in the information already provided under this section shall be provided in writing within 15 calendar days after the change in accordance with 40 CFR 63.9(j). |

Table 3.2 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources (continued)
<table>
<thead>
<tr>
<th>Section</th>
<th>Subject</th>
<th>Summary of Section Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>63.10</td>
<td>Recordkeeping and Reporting Requirements</td>
<td>• The permittee shall maintain files of all required information recorded in a form suitable and readily available for expeditious inspection and review in accordance with 40 CFR 63.10(b)(1). The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. • The permittee shall maintain relevant records of the following in accordance with 40 CFR 63.10(b)(2); o The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards; o The occurrence and duration of each malfunction of operation or the required air pollution control and monitoring equipment; o Actions taken during periods of startup or shutdown when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan; or o Actions taken during periods of malfunction when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan; o All information necessary, including actions taken, to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan (see 40 CFR 63.6(e)(3)) when all actions taken during periods of startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a “checklist,” or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events); o Each period during which a CMS is malfunctioning or inoperative (including out-of-control periods); o All required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report); o All results of performance tests, CMS performance evaluations, and opacity and visible emission observations; o All measurements as may be necessary to determine the conditions of performance tests and performance evaluations; o All CMS calibration checks; o All adjustments and maintenance performed on CMS; o All emission levels relative to the criterion for obtaining permission to use an alternative to the relative accuracy test, if the source has been granted such permission under 40 CFR 63.8(f)(6); and o All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9. • If an permittee determines that his or her stationary source that emits one or more HAP, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to a relevant standard because of limitations on the source's potential to emit or an exclusion, the permittee must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first in accordance with 40 CFR 63.10(b).</td>
</tr>
</tbody>
</table>

[40 CFR 63, Subpart A]
Monitoring and Recordkeeping

3.22 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating 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.

Performance Testing

3.23 If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

3.24 All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

3.25 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.

3.26 The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the “Reports and Certifications” facility wide condition (Permit Condition 3.27).
Reports and Certifications

3.27 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130–136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Lewiston Regional Office
1118 F. Street
Lewiston, Idaho 83501
Phone: (208) 799-4370
Fax: (208) 799-3451

The periodic compliance certification required in the general provisions (General Provision 10.22) shall also be submitted within 30 days of the end of the specified reporting period to:

Part 70 Operating Permit Program
U.S. EPA Region 10, Mail Stop: OAW-150
1200 Sixth Ave., Suite 155
Seattle, WA 98101

Incorporation of Federal Requirements by Reference

3.28 Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63, Subparts ZZZZ and JJJJJJ.

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

Facility-Wide Limits on Hazardous Air Pollutant Emissions

3.29 Facility-wide emissions in any consecutive 12-calendar months shall not exceed 9.49 tons of any one hazardous air pollutant (HAP), and 24.49 tons for all HAPs combined.

Kiln, Boiler, and Emergency Generator Engine Emissions Limits Compliance Monitoring

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

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

- Emissions from the boiler shall be assessed using Boiler Steam Monitoring data and emission factors established from Boiler Performance Testing data, or emissions factors from AP-42 if the performance test does not have data for HAPs.

  If AP-42 EFs are used in the emissions calculation, the permittee shall develop a fuel heat input to steam output ratio (FHISOR) following EPA Region 10’s Fuel-Heat-Input-to-Steam-Output-Ratio memo before or at the next upcoming boiler source testing.

- Emissions from the emergency generator engine.  
  [PTC No. P-2007.0107, XX/XX/2022]
4. Hog Fuel Boiler

Summary Description

Bark from the log debarking process is sent to a bark hog where it is reduced to a size appropriate for use as boiler fuel and conveyed to the main fuel conveyor (TR10). Sawdust from the sawmill and shavings from the planing mills are also conveyed to the main fuel conveyor to be used as boiler fuel. The Zurn Industries hog-fuel boiler is an Erie City Type C, three-drum water tube boiler using a spreader-stoker firing method with ash reinjection and four (4) manually-operated soot blowers. The boiler is designed to continuously provide 60,000 pounds per hour of saturated steam at 250°F to the lumber drying kilns. Particulate emissions from the Zurn Industrial Boiler are controlled by a multiclone in series with a wet scrubber and cyclone separator.

Table 4.2 describes the devices used to control emissions from hog fuel boiler.

<table>
<thead>
<tr>
<th>Table 4.2 Hog Fuel Boiler Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Emissions Units / Processes</strong></td>
</tr>
<tr>
<td>Zurn Industries hog-fuel boiler</td>
</tr>
<tr>
<td><strong>Control Devices</strong></td>
</tr>
<tr>
<td>Zurn Industries multiclone followed by Zurn wet scrubber with cyclone separator</td>
</tr>
</tbody>
</table>

Table 4.2 contains only a summary of the requirements that apply to the hog-fuel boiler. Specific permit requirements are listed below the table.

Table 4.2. Applicable Requirements Summary

<table>
<thead>
<tr>
<th>Permit Conditions</th>
<th>Parameter</th>
<th>Limit / Standard Summary</th>
<th>Applicable Requirements Reference</th>
<th>Operating, Monitoring, and Recordkeeping Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1</td>
<td>PM grain loading</td>
<td>PM emissions shall not exceed 0.200 gr/dscf at 8% oxygen</td>
<td>IDAPA 58.01.01.677</td>
<td>4.3, 4.4, 4.5, 4.7, 4.8, 4.9, 4.11, Section 8 (CAM)</td>
</tr>
<tr>
<td>4.2</td>
<td>PM10 emissions limits</td>
<td>PM10 hourly and annual emissions limits</td>
<td>PTC P-2007.0107</td>
<td>4.3, 4.4, 4.5, 4.7, 4.8, 4.9, 4.11, Section 8 (CAM)</td>
</tr>
<tr>
<td>4.3</td>
<td>Fuel Type</td>
<td>Exclusively wood products</td>
<td>PTC P-2007.0107</td>
<td>3.22</td>
</tr>
<tr>
<td>4.4</td>
<td>Steaming rate</td>
<td>Determine by equation (not to exceed 60, 000 lb/hr)</td>
<td>PTC P-2007.0107</td>
<td>4.7, 4.9, 4.11</td>
</tr>
<tr>
<td>4.13 - 4.25</td>
<td>NESHAP standards</td>
<td>Tune up, Energy Assessment, Work Practices/Management Practice Standards</td>
<td>40 CFR 63, Subpart JJJJJ</td>
<td>4.13 - 4.25 and Table 8 to Subpart JJJJJ</td>
</tr>
</tbody>
</table>

Emission Limits

4.1 The permittee shall not discharge into the atmosphere from any fuel burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 million Btu per hour, particulate matter in excess of 0.200 gr/dscf corrected to 8% oxygen while combusting wood fuel.

[PTC No. P-2007.0107, XX/XX/2022; IDAPA 58.01.01.677]
4.2 The PM$_{10}$ and CO emissions from the hog-fuel boiler stack shall not exceed any corresponding emission rate limits listed in Table 4.3.

<table>
<thead>
<tr>
<th>Source Description</th>
<th>PM$_{10}^{b}$</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zurn hog fuel boiler</td>
<td>27</td>
<td>99.48</td>
</tr>
</tbody>
</table>

a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
b) Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
d) Tons per any consecutive 12-calendar month period.

[PTC No. P-2007.0107, XX/XX/2022]

**Operating Requirements**

4.3 **Fuel Type**

The hog fuel boiler shall be fueled exclusively by wood products.

[PTC No. P-2007.0107, XX/XX/2022]

4.4 **Steam Production and Steaming Rate Limits**

The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the steam production rate of the Zurn Industries hog fuel boiler. If the continuous steaming rate measurement system becomes inoperable, a backup monitoring method consisting of manual hourly readings or calculations shall be implemented within 96 hours of the continuous steaming rate measurement system becoming inoperable, and shall be used until the original system is operational.

[PTC No. P-2007.0107, XX/XX/2022]

On a 24-hour average, the operational steaming rate shall be maintained at or below the lesser of:

- 60,000 pounds of steam per hour,
- A maximum steaming rate in pounds per hour based on the average one-hour steaming rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with the PM$_{10}$ lb/hr emissions limit in Permit Condition 3.3.1 of PTC, calculated as follows:

$$Max. \ steaming \ rate = \ Avg. \ steaming \ rate \ during \ test \times \frac{27 \ lb/ \ hr \ PM_{10}}{Tested \ lb/ \ hr \ PM_{10}}$$

- A maximum rate in pounds per hour based on the average one-hour steaming rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with the grain loading emissions limit in Permit Condition 3.3.2 of PTC, calculated as follows:

$$Max. \ steaming \ rate = \ Avg. \ steaming \ rate \ during \ test \times \frac{0.20 \ gr/ \ dscf \ @ \ 8\% \ Oxygen}{Tested \ grain \ loading \ @ \ 8\% \ Oxygen}$$
The permittee may conduct additional performance tests during the permit term to revise the allowable steaming rate so long as the performance tests conform to all requirements of this permit. Whenever the steaming rate exceeds the allowable steaming rate, the permittee shall take corrective action within a reasonable time, but no longer than 24 hours from the discovery of the exceedance, to bring the steaming rate to the allowable rate or below. Deviations from this allowable operating rate shall not constitute a violation of this permit, unless the permittee fails to take corrective action or an emission standard prescribed in this permit is exceeded. DEQ may consider the frequency, duration, or magnitude of the deviations to determine if additional action is required.

[PTC No. P-2007.0107, XX/XX/2022]

### 4.5 Multiclone and Wet Scrubber Operations

4.5.1 The permittee shall install and operate a multiclone in series with a wet scrubber and cyclone separator to control the emissions from the hog fuel boiler.

4.5.2 The multiclone and wet scrubber shall be in operation at all times during operation of the hog fuel boiler.

4.5.3 The permittee shall install, operate, calibrate, and maintain a device to continuously monitor the ID fan outlet (scrubber inlet) pressure and the pressure drop across the hog fuel boiler multiclone during operation of the hog fuel boiler.

4.5.4 The permittee shall install, operate, calibrate, and maintain a device to continuously measure the scrubbing media flow rate in gallons per minute.

[PTC No. P-2007.0107, XX/XX/2022]

4.6 Reserved

### Monitoring and Recordkeeping Requirements

### 4.7 Performance Testing

The permittee shall conduct a performance test at least once every five years on the Zurn hog-fuel boiler to demonstrate compliance with the opacity limit, the PM₁₀ lb/hr emissions limit, and the grain loading standard.

The permittee shall test in accordance with IDAPA 58.01.01.157 and the conditions of this permit including the operating requirements for the Zurn hog-fuel boiler and Performance Testing Requirements under Facility-wide Condition Section of this permit.

The source test shall be conducted under “worst case normal” conditions as required by IDAPA 58.01.01.157 and General Provision 6 and the source test report shall contain documentation that the test was conducted under these conditions.

The following information, at a minimum, shall be recorded during each performance test run and included in the performance test report:

- The steam production rate of the boiler shall be recorded in pounds per hour;
- The pressure drop across the multiclone and the ID fan outlet (scrubber inlet) pressure shall be recorded in inches of water at least once each 15 minutes during each test run;
- The scrubbing media flow rate shall be recorded in gallons per minute once each 15 minutes during each test run;
- Visible emissions from the boiler stack shall be observed and recorded during each test run, using the methods specified in IDAPA 58.01.01.625.

[IDAPA 58.01.01.322.09; PTC No. P-2007.0107, XX/XX/2022]
4.8 After the initial performance test, future testing shall be performed according to the following schedule. If the PM or PM$_{10}$ emission rate measured in the most recent test is less than or equal to 75% of the applicable emission limit, the next test shall be conducted within five years of the test date. If the PM or PM$_{10}$ emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the applicable emission limit, the next test shall be conducted within two years of the test date. If the PM or PM$_{10}$ emission rate measured during the most recent performance test is greater than 90% of the applicable emission limit, the next test shall be conducted within one year of the test date.

[PTC No. P-2007.0107, XX/XX/2022]

4.9 Maintain Copy of Source Tests

A copy of the most recent DEQ-approved source test for each pollutant tested and a copy of the corresponding DEQ review/approval letter which contains the permit number shall remain onsite at all times and shall be made available to Department representatives upon request.

[PTC No. P-2007.0107, XX/XX/2022]

4.10 HAPs Monitoring

The permittee shall calculate and record the emissions of methanol and total HAPs from the hog-fuel boiler on a monthly basis, in units of tons per month and tons for the most recent consecutive 12-calendar month period.$^1$

[PTC No. P-2007.0107, XX/XX/2022]

4.11 Steam Production Monitoring for Boiler

The permittee shall monitor and record the daily steam production of the boiler to demonstrate compliance with steam production limit. Each month, the permittee shall sum the daily steam production for that month and for the previous 12 consecutive calendar-month period. Records shall be maintained on site and shall be made available to DEQ representatives upon request.

[PTC No. P-2007.0107, XX/XX/2022]

4.12 PM$_{10}$ Emissions Calculation

The permittee shall calculate the annual PM$_{10}$ emissions as follows:

- Multiply the total monthly steam produced by the emission factor derived from the most recent DEQ-approved source test. The emission factor shall be in pounds of PM$_{10}$ per pound of steam produced during the test.
- Sum the monthly PM$_{10}$ emissions derived above for each 12-consecutive calendar month period.

[PTC No. P-2007.0107, XX/XX/2022]

40 CFR 63 Subpart JJJJJJJ – “National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources”

4.13 In accordance with 40 CFR 63.11201(b), you must comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to this subpart that applies to your boiler. An energy assessment completed on or after January 1, 2008 that meets or

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$^1$ Recommended HAP emissions calculations are described in the Statement of Basis for PTC P-2007.0107, Project No. 60629.
is amended to meet the energy assessment requirements in Table 2 to this subpart satisfies the energy assessment requirement. A facility that operates under an energy management program established through energy management systems compatible with ISO 50001, that includes the affected units, also satisfies the energy assessment requirement.

[40 CFR 63.11201(b)]

4.14 In accordance with 40 CFR 63.11201(d), these standards apply at all times the affected boiler is operating, except during periods of startup and shutdown as defined in §63.11237, during which time you must comply only with Table 2 to this subpart.

[40 CFR 63.11201(d)]

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

[40 CFR 63.11205(a)]

4.16 In accordance with 40 CFR 63.11214(b), you must conduct a performance tune-up according to §63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler.

[40 CFR 63.11214(b)]

4.17 In accordance with 40 CFR 63.11223(a), you must conduct a performance tune-up according to paragraph (b) of this section and keep records as required in §63.11225(c) to demonstrate continuous compliance. You must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up.

[40 CFR 63.11223(a)]

4.18 In accordance with 40 CFR 63.11223(c), boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune-up must conduct a tune-up of the boiler every 5 years as specified in paragraphs (b)(1) through (7) of this section. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed boiler with an oxygen trim system, the first 5-year tune-up must be no later than 61 months after the initial startup. You may delay the burner inspection specified in paragraph (b)(1) of this section and inspection of the system controlling the air-to-fuel ratio specified in paragraph (b)(3) of this section until the next scheduled unit shutdown, but you must inspect each burner and system controlling the air-to-fuel ratio at least once every 72 months.

[40 CFR 63.11223(c)]

4.19 In accordance with 40 CFR 63.11225(c), you must maintain the records specified in paragraphs (c)(1) through (7) of this section.

(1) As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.

(2) You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in paragraphs (c)(2)(i) through (vi) of this section.

(i) Records must identify each boiler, the date of tune-up, the procedures followed for
tune-up, and the manufacturer's specifications to which the boiler was tuned.

(iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.

(4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.

(5) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

[40 CFR 63.11225(c)]

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

[40 CFR 63.11225(d)]

4.21 In accordance with 40 CFR 63.11225(g), if you have switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within subpart JJJJJJ, in the boiler becoming subject to subpart JJJJJ, or in the boiler switching out of subpart JJJJJ due to a change to 100 percent natural gas, or you have taken a permit limit that resulted in you being subject to subpart JJJJJJ, you must provide notice of the date upon which you switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:

(1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.

(2) The date upon which the fuel switch, physical change, or permit limit occurred.

[40 CFR 63.11225(g)]

4.22 In accordance with 40 CFR 63.11226, In response to an action to enforce the standards set forth in §63.11201 you may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction, as defined at 40 CFR 63.2. Appropriate penalties may be assessed if you fail to meet your burden of proving all of the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief.

[40 CFR 63.11226]

4.23 In accordance with 40 CFR 63.11226(a) Assertion of affirmative defense. To establish the affirmative defense in any action to enforce such a standard, you must timely meet the reporting requirements in paragraph (b) of this section, and must prove by a preponderance of evidence that:

(1) The violation:

(i) Was caused by a sudden, infrequent, and unavoidable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner; and

(ii) Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and

(iii) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and

(iv) Was not part of a recurring pattern indicative of inadequate design, operation, or
maintenance; and
(2) Repairs were made as expeditiously as possible when a violation occurred; and
(3) The frequency, amount, and duration of the violation (including any bypass) were minimized
to the maximum extent practicable; and
(4) If the violation resulted from a bypass of control equipment or a process, then the bypass was
unavoidable to prevent loss of life, personal injury, or severe property damage; and
(5) All possible steps were taken to minimize the impact of the violation on ambient air quality,
the environment, and human health; and
(6) All emissions monitoring and control systems were kept in operation if at all possible,
consistent with safety and good air pollution control practices; and
(7) All of the actions in response to the violation were documented by properly signed,
contemporaneous operating logs; and
(8) At all times, the affected source was operated in a manner consistent with good practices for
minimizing emissions; and
(9) A written root cause analysis has been prepared, the purpose of which is to determine,
correct, and eliminate the primary causes of the malfunction and the violation resulting from
the malfunction event at issue. The analysis shall also specify, using best monitoring methods
and engineering judgment, the amount of any emissions that were the result of the
malfunction.

[40 CFR 63.11226(a)]

4.24 In accordance with 40 CFR 63.11226(b) Report, the owner or operator seeking to assert an
affirmative defense shall submit a written report to the Administrator with all necessary
supporting documentation, that it has met the requirements set forth in paragraph (a) of this
section. This affirmative defense report shall be included in the first periodic compliance,
deviation report or excess emission report otherwise required after the initial occurrence of the
violation of the relevant standard (which may be the end of any applicable averaging period). If
such compliance, deviation report or excess emission report is due less than 45 days after the
initial occurrence of the violation, the affirmative defense report may be included in the second
compliance, deviation report or excess emission report due after the initial occurrence of the
violation of the relevant standard.

[40 CFR 63.11226(b)]

4.25 As stated in 40 CFR 63.11235, you must comply with the applicable General Provisions
according to the following:

Table 8 to Subpart JJJJJJ of Part 63—Applicability of General Provisions to Subpart JJJJJJ

<table>
<thead>
<tr>
<th>General provisions cite</th>
<th>Subject</th>
<th>Does it apply?</th>
</tr>
</thead>
<tbody>
<tr>
<td>§63.1</td>
<td>Applicability</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.2</td>
<td>Definitions</td>
<td>Yes. Additional terms defined in §63.11237.</td>
</tr>
<tr>
<td>§63.3</td>
<td>Units and Abbreviations</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.4</td>
<td>Prohibited Activities and Circumvention</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.5</td>
<td>Preconstruction Review and Notification</td>
<td>No</td>
</tr>
<tr>
<td>Requirements</td>
<td>Compliance with Standards and</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.6(a), (b)(1)-(b)(5),</td>
<td></td>
<td></td>
</tr>
<tr>
<td>General provisions cite</td>
<td>Subject</td>
<td>Does it apply?</td>
</tr>
<tr>
<td>-------------------------</td>
<td>---------</td>
<td>---------------</td>
</tr>
<tr>
<td>(3), (g), (i), (j)</td>
<td>Maintenance Requirements</td>
<td>No. See §63.11205 for general duty requirement.</td>
</tr>
<tr>
<td>§63.6(e)(1)(i)</td>
<td>General Duty to minimize emissions</td>
<td>No. See §63.11205 for general duty requirement.</td>
</tr>
<tr>
<td>§63.6(e)(1)(ii)</td>
<td>Requirement to correct malfunctions ASAP</td>
<td>No.</td>
</tr>
<tr>
<td>§63.6(e)(3)</td>
<td>SSM Plan</td>
<td>No.</td>
</tr>
<tr>
<td>§63.6(f)(1)</td>
<td>SSM exemption</td>
<td>No.</td>
</tr>
<tr>
<td>§63.6(h)(1)</td>
<td>SSM exemption</td>
<td>No.</td>
</tr>
<tr>
<td>§63.6(h)(2) to (9)</td>
<td>Determining compliance with opacity emission standards</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.7(a), (b), (c), (d), (e)(2)-(e)(9), (f), (g), and (h)</td>
<td>Performance Testing Requirements</td>
<td>No.</td>
</tr>
<tr>
<td>§63.7(e)(1)</td>
<td>Performance testing</td>
<td>No. See §63.11210.</td>
</tr>
<tr>
<td>§63.8(a), (b), (c)(1), (c)(1)(ii), (c)(2) to (c)(9), (d)(1) and (d)(2), (e),(f), and (g)</td>
<td>Monitoring Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.8(c)(1)(i)</td>
<td>General duty to minimize emissions and CMS operation</td>
<td>No.</td>
</tr>
<tr>
<td>§63.8(c)(1)(iii)</td>
<td>Requirement to develop SSM Plan for CMS</td>
<td>No.</td>
</tr>
<tr>
<td>§63.8(d)(3)</td>
<td>Written procedures for CMS</td>
<td>Yes, except for the last sentence, which refers to an SSM plan. SSM plans are not required.</td>
</tr>
<tr>
<td>§63.9</td>
<td>Notification Requirements</td>
<td>Yes, excluding the information required in §63.9(b)(2)(i)(B), (D), (E) and (F). See §63.11225.</td>
</tr>
<tr>
<td>§63.10(a) and (b)(1)</td>
<td>Recordkeeping and Reporting Requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(b)(2)(i)</td>
<td>Recordkeeping of occurrence and duration of startups or shutdowns</td>
<td>No.</td>
</tr>
<tr>
<td>§63.10(b)(2)(ii)</td>
<td>Recordkeeping of malfunctions</td>
<td>No. See §63.11225 for recordkeeping of (1) occurrence and duration and (2) actions taken during malfunctions.</td>
</tr>
<tr>
<td>§63.10(b)(2)(iii)</td>
<td>Maintenance records</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(b)(2)(iv) and (v)</td>
<td>Actions taken to minimize emissions during SSM</td>
<td>No.</td>
</tr>
<tr>
<td>§63.10(b)(2)(vi)</td>
<td>Recordkeeping for CMS malfunctions</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(b)(2)(vii) to (xiv)</td>
<td>Other CMS requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(b)(3)</td>
<td>Recordkeeping requirements for</td>
<td>No.</td>
</tr>
<tr>
<td>General provisions cite</td>
<td>Subject</td>
<td>Does it apply?</td>
</tr>
<tr>
<td>-------------------------</td>
<td>---------</td>
<td>---------------</td>
</tr>
<tr>
<td>§63.10(c)(1) to (9)</td>
<td>Recordkeeping for sources with CMS</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(c)(10)</td>
<td>Recording nature and cause of malfunctions</td>
<td>No. See §63.11225 for malfunction recordkeeping requirements.</td>
</tr>
<tr>
<td>§63.10(c)(11)</td>
<td>Recording corrective actions</td>
<td>No. See §63.11225 for malfunction recordkeeping requirements.</td>
</tr>
<tr>
<td>§63.10(c)(12) and (13)</td>
<td>Recordkeeping for sources with CMS</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(c)(15)</td>
<td>Allows use of SSM plan</td>
<td>No.</td>
</tr>
<tr>
<td>§63.10(d)(1) and (2)</td>
<td>General reporting requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(d)(3)</td>
<td>Reporting opacity or visible emission observation results</td>
<td>No.</td>
</tr>
<tr>
<td>§63.10(d)(4)</td>
<td>Progress reports under an extension of compliance</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(d)(5)</td>
<td>SSM reports</td>
<td>No. See §63.11225 for malfunction reporting requirements.</td>
</tr>
<tr>
<td>§63.10(e)</td>
<td>Additional reporting requirements for sources with CMS</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.10(f)</td>
<td>Waiver of recordkeeping or reporting requirements</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.11</td>
<td>Control Device Requirements</td>
<td>No.</td>
</tr>
<tr>
<td>§63.12</td>
<td>State Authority and Delegation</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.13-63.16</td>
<td>Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions</td>
<td>Yes.</td>
</tr>
<tr>
<td>§63.1(a)(5), (a)(7)-(a)(9), (b)(2), (c)(3)-(4), (d), 63.6(b)(6), (c)(3), (c)(4), (d), (e)(2), (e)(3)(ii), (h)(3), (b)(5)(iv), 63.8(a)(3), 63.9(b)(3), (h)(4), 63.10(c)(2)-(4), (c)(9)</td>
<td>Reserved</td>
<td>No.</td>
</tr>
</tbody>
</table>

[Table 8 to 40 CFR Subpart JJJJJJJ]

T1-2021.0045 Page 27
5. Drying Kilns

Summary Description

Green dimensional lumber from the sawmill is dried in a series of drying kilns to reduce the moisture content from around 43-47% to around 19%. Saturated steam from the Zurn Hog Fuel Boiler provides heat to the kilns to dry the lumber.

Table 5.1 describes the devices used to control emissions from drying kilns.

<table>
<thead>
<tr>
<th>Emissions Units / Processes</th>
<th>Control Devices</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lumber Drying Kilns No. 1 through No. 7</td>
<td>None</td>
</tr>
</tbody>
</table>

Table 5.2 contains only a summary of the requirements that apply to the drying kilns. Specific permit requirements follow Table 5.2.

<table>
<thead>
<tr>
<th>Permit Conditions</th>
<th>Parameter</th>
<th>Limit / Standard Summary</th>
<th>Applicable Requirements Reference</th>
<th>Operating, Monitoring, and Recordkeeping Requirements</th>
</tr>
</thead>
</table>
| 5.1               | Emission Limits | PM$_{10}$ - 3.94 T/yr,  
|                   |            | VOC – 205.1 T/yr         | PTC No. P-2007.0107                  | 5.4, 5.5, 5.6-5.9 |
| 5.2, 5.3          | Particulate Matter | Equations                | IDAPA 58.01.01.702                | 5.6-5.8                                             |
|                   |            |                          | IDAPA 58.01.01.701                |                                                     |
| 5.4               | Throughput to kilns | 157,585 thousand board feet (lumber scale) | PTC No. P-2007.0107 | 5.7 |

Emission Limits

5.1 The PM$_{10}$ and VOC emissions from the Kilns 1 through 7 vents (combined) shall not exceed any corresponding emissions rate limits listed in Table 5.3.

<table>
<thead>
<tr>
<th>Source Description</th>
<th>PM$_{10}$ T/yr</th>
<th>VOC T/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lumber Drying Kilns 1 through 7 combined emissions</td>
<td>3.94</td>
<td>205.1</td>
</tr>
</tbody>
</table>

5.2 In accordance with IDAPA 58.01.01.702, the permittee shall not discharge into the atmosphere from any source operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where $E$ is the allowable emission from the entire source in pounds per hour, and $PW$ is the process weight in pounds per hour:

[PTC No. P-2007.0107, XX/XX/2022]
5.3 In accordance with IDAPA 58.01.01.701, the permittee shall not discharge to the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where \( E \) is the allowable emission from the entire source in pounds per hour, and \( PW \) is the process weight in pounds per hour:

a. If \( PW \) is less than 9,250 pounds per hour,

\[
E = 0.045(PW)^{0.6}
\]

b. If \( PW \) is equal to or greater than 9,250 pounds per hour,

\[
E = 1.10(PW)^{0.25}
\]

[IDAPA 58.01.01.702; PTC No. P-2007.0107, XX/XX/2022]

Operating Requirements

5.4 Throughput (i.e., Production) Limits-Kilns 1 through 7 Combined

The throughput through Kilns 1 through 7 combined shall not exceed 157,585 thousand board feet (lumber scale) in any consecutive 12-calendar months.

[PTC No. P-2007.0107, XX/XX/2022]

5.5 Temperature Monitoring – Kilns 1 through 7

The permittee shall install, calibrate, maintain, and operate a device on each kiln to measure and record the kiln temperature.

[PTC No. P-2007.0107, XX/XX/2022]

Monitoring and Recordkeeping Requirements

5.6 Kiln O&M Manual

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

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

- Procedures for installation, calibration, and maintenance of kiln temperature controllers and sensors in accordance with manufacturer’s instructions.
- Procedures and frequency of calibration checks for kiln temperature sensors. Calibration checks for entering-air temperature sensors shall be completed at least once every six months.
- Procedures and frequency for auditing and updating maximum entering-air temperature determinations for each kiln drying schedule as specified in the Kiln Drying Schedules and Maximum Entering-Air Temperature Determinations permit condition. At least once every six months or more frequently when appropriate (e.g., such as when drying schedule parameters are changed), each drying schedule maximum entering-air temperature determination shall be audited by comparing the control chart from the most recent charge processed using that schedule to the control chart used in determining the maximum entering-air temperature for that schedule. The maximum entering-air temperature for the most recent charge processed shall be determined using one of the specified methods, and if this maximum temperature exceeds the previously-determined maximum temperature for that drying schedule, then the most recent maximum temperature shall be used in assessing emissions from the kilns beginning from the starting time that the charge was processed. If schedule parameters are changed, or a new schedule is created, the maximum entering-air temperature shall be established initially using one of the specified methods for the first charge processed using the new parameters, and subsequently audited every six months as described above.
- The permittee shall operate the kilns in accordance with the O&M manual. The procedures specified in the O&M manual are incorporated by reference into this permit and are enforceable permit conditions. The O&M manual and copies of any manufacturer’s manual(s) and recommendations shall remain onsite at all times and shall be made available to DEQ representatives upon request.

5.7 Kiln Production and Temperature Monitoring

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

- Starting and ending date/time of drying;
- All species of wood contained in the kiln charge;
- The total quantity of lumber present in the kiln charge, in units of million board-feet (MMbf); and
- The maximum entering-air temperature for the schedule used to dry the kiln charge, in units of degrees Fahrenheit (°F).

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

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

[PTC No. P-2007.0107, XX/XX/2022]
Monthly production totals for each species shall be used for assessing VOC and HAP emissions from the kiln as specified in Kiln VOC and HAP Emissions Tracking permit condition. Monthly production totals for all species combined shall be used to determine compliance with the Kiln Production Limit.

[PTC No. P-2007.0107, XX/XX/2022]

5.8 Kiln Drying Schedules and Maximum Entering Air Temperature Determinations

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

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

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

[PTC No. P-2007.0107, XX/XX/2022]

5.9 Kiln VOC and HAP Emissions Tracking

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

- VOC and HAP emissions from all of the kilns shall be calculated using Kiln Production and Temperature Monitoring data and the emission factors in Table 4.3. Use of alternate emission factors requires prior DEQ approval.

- The value “X” in the emission factor equation is the “maximum entering-air temperature” in degrees Fahrenheit as determined using the procedures in the Kiln Drying Schedules and Maximum Entering-Air Temperature Determinations permit condition. When tracking a multiple-species charge, the permittee shall use the highest emission factor of all of the wood species in the charge. Emission factors calculated at less than zero shall be set equal to zero (negative emission factor values are possible with low X values).

- VOC and HAP emission factors are developed using the maximum entering-air temperature and Table 4.3 following the example below for drying Douglas fir at 220 °F:

  VOC emission factor = 0.01460*(220)-1.77130 = 1.4407 lb/mbf

- Monthly kiln VOC and HAP emissions shall be calculated using the quantity and species for each kiln charge and the VOC and HAP emission factors calculated based on the maximum entering-air temperature for that kiln charge.

- Annual kiln VOC and HAP emissions are calculated by summing each monthly VOC emissions over the previous consecutive 12-month period.
Table 5.4 Lumber Drying Kiln VOC and HAP Emission Factors(a)

<table>
<thead>
<tr>
<th>Species</th>
<th>VOC lb/mbf (b)</th>
<th>Methanol HAP lb/mbf (b)</th>
<th>Formaldehyde HAP lb/mbf (b)</th>
<th>Acetaldehyde HAP lb/mbf (b)</th>
<th>Propionaldehyde HAP lb/mbf (b)</th>
<th>Acrolein HAP lb/mbf (b)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Species: Non-Resinous Softwood</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Western True Fir (c)</td>
<td>0.00817(X)–1.02133</td>
<td>0.00465(X)–0.73360</td>
<td>0.00016(X)–0.02764</td>
<td>0.0550</td>
<td>0.0003</td>
<td>0.0009</td>
</tr>
<tr>
<td>Western Hemlock</td>
<td>0.00369(X)–0.39197</td>
<td>0.00249(X)–0.39750</td>
<td>0.000046(X)–0.007622</td>
<td>0.0677</td>
<td>0.0004</td>
<td>0.0012</td>
</tr>
<tr>
<td>Western Red Cedar (d)</td>
<td>0.00817(X)–1.02133</td>
<td>0.00465(X)–0.73360</td>
<td>0.00016(X)–0.02764</td>
<td>0.0677</td>
<td>0.0004</td>
<td>0.0012</td>
</tr>
<tr>
<td>Species: Resinous Softwood (Non-Pine Family)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Douglas Fir</td>
<td>0.01460(X)–1.77130</td>
<td>0.00114(X)–0.16090</td>
<td>0.000028(X)–0.00380</td>
<td>0.0275</td>
<td>0.0003</td>
<td>0.0005</td>
</tr>
<tr>
<td>Engelmann Spruce</td>
<td>0.1769</td>
<td>0.00088(X)–0.13526</td>
<td>0.000042(X)–0.006529</td>
<td>0.0201</td>
<td>0.0002</td>
<td>0.0005</td>
</tr>
<tr>
<td>Larch</td>
<td>0.01460(X)–1.77130</td>
<td>0.00114(X)–0.16090</td>
<td>0.000028(X)–0.00380</td>
<td>0.0275</td>
<td>0.0003</td>
<td>0.0005</td>
</tr>
<tr>
<td>Species: Resinous Softwood (Pine Family)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lodgepole Pine</td>
<td>1.1352</td>
<td>0.0550</td>
<td>0.0030</td>
<td>0.0104</td>
<td>0.0003</td>
<td>0.0008</td>
</tr>
<tr>
<td>Ponderosa Pine</td>
<td>0.02083(X)–1.30029</td>
<td>0.00137(X)–0.18979</td>
<td>0.000074(X)–0.010457</td>
<td>0.034</td>
<td>0.0010</td>
<td>0.0026</td>
</tr>
<tr>
<td>Western White Pine</td>
<td>0.02083(X)–1.30029</td>
<td>0.00137(X)–0.18979</td>
<td>0.000074(X)–0.010457</td>
<td>0.034</td>
<td>0.0010</td>
<td>0.0026</td>
</tr>
<tr>
<td>Species: Other Species Not Listed</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Species Not Listed (e)</td>
<td>0.02083(X)–1.30029</td>
<td>0.00465(X)–0.73360</td>
<td>0.00016(X)–0.02764</td>
<td>0.0677</td>
<td>0.0010</td>
<td>0.0026</td>
</tr>
</tbody>
</table>

a) Emission factors for Non-Resinous Softwood and Resinous Softwoods are from “EPA Region 10 HAP and VOC Emission Factors for Lumber Drying, January 2021”
b) Pounds per thousand board feet (lb/mbf).
c) Western true firs consist of the following seven species classified in the same Abies genus: bristlecone fir, California red fir, grand fir, noble fir, pacific silver fir, subalpine fir and white fir.
d) Includes western red cedar and any other cedar species.
e) If a species dried is not listed in this table, or the lumber processed includes an indeterminate mixture or variety of species, the emission factors for “Other Species Not Listed” species shall be used when assessing emissions.

[PTC No. P-2007.0107, XX/XX/2022]
6. Woodworking Equipment

Summary Description

Woodworking equipment includes the sawmill and the two planing mills.

Heavy sawdust from the sawmill is transferred by conveyor (TR8) to a sawdust cyclone (P7) or sawdust cyclone target box (P21). Material collected from the P7 sawdust cyclone is conveyed to the hog-fuel boiler. Material collected from the P21 target box is loaded into the sawdust truck bin (ST2) with a bottom drop to trucks (TR14).

Light sawdust from the sawmill is routed first through a baghouse (P24) and then to a baghouse cyclone (P6). Material collected in the baghouse cyclone is conveyed to the hog-fuel boiler.

Shavings from the old and new planing mills are collected in shavings cyclones (P11) and (P12), respectively. The collected material from these two cyclones is conveyed to shavings cyclone (P14) or to shavings cyclone (P13). Material collected from P14 is conveyed to the hog-fuel boiler. Material collected from P13 is loaded into the truck shavings bin (ST6) with a bottom drop to trucks (TR16).

Table 6.1 describes the devices used to control emissions from the sawmill.

<table>
<thead>
<tr>
<th>Emissions Units / Processes</th>
<th>Control Devices</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sawmill</td>
<td>Cyclones, baghouses, target box</td>
</tr>
</tbody>
</table>

Table 6.2 contains only a summary of the requirements that apply to the woodworking equipment. Specific permit requirements are listed below.

<table>
<thead>
<tr>
<th>Permit Conditions</th>
<th>Parameter</th>
<th>Limit / Standard Summary</th>
<th>Applicable Requirements Reference</th>
<th>Operating, Monitoring, and Recordkeeping Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.1, 6.2</td>
<td>Particulate matter</td>
<td>Equation</td>
<td>IDAPA 58.01.01.702,</td>
<td>6.3, 6.4, 6.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>IDAPA 58.01.01.701,</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>PTC No. P-2007.0107</td>
<td></td>
</tr>
</tbody>
</table>

Emission Limits

6.1 In accordance with IDAPA 58.01.01.702, the permittee shall not discharge into the atmosphere from any source operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where $E$ is the allowable emission from the entire source in pounds per hour, and $PW$ is the process weight in pounds per hour:

a. If $PW$ is less than 17,000 pounds per hour,

$$E = 0.045(PW)^{0.6}$$
b. If PW is equal to or greater than 17,000 pounds per hour,

\[ E = 1.12(PW)^{0.27} \]

[IDAPE 58.01.01.702; PTC No. P-2007.0107, XX/XX/2022]

6.2 In accordance with IDAPA 58.01.01.701, the permittee shall not discharge into the atmosphere from any source operating on or after October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

a. If PW is less than 9,250 pounds per hour,

\[ E = 0.045(PW)^{0.6} \]

b. If PW is equal to or greater than 9,250 pounds per hour,

\[ E = 1.10(PW)^{0.25} \]

[IDAPE 58.01.01.701; PTC No. P-2007.0107, XX/XX/2022]

Operating Requirements
6.3 Operation of cyclones and baghouse/filter systems

The permittee shall install and operate cyclones and baghouse/filter system(s) to control emissions from woodworking equipment at this facility.

[PTC No. P-2007.0107, XX/XX/2022]

6.4 Cyclone and Baghouse/Filter System Procedures

The permittee shall have developed a Cyclone and Baghouse/Filter System Procedures document regarding the inspection and operation of the cyclones and baghouses/filter system(s) which controls the PM and PM\(_{10}\) emissions from woodworking equipment at this facility. The document shall describe the procedures that will be followed to comply with good working order and efficient operating practices, and shall contain, at a minimum, requirements for monthly inspections of the cyclones and baghouse(s). The inspection procedures shall include, but not be limited to:

- A visible emissions observation while operating;
- If visible emissions are present the opacity of the visible emissions shall be determined in accordance with procedures contained in IDAPA 58.01.01.625;
- Checking the bags or cartridges for structural integrity; and
- Checking to assure that bags or cartridges are appropriately secured in place.

The Baghouse/Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if:

- Visible emissions are determined to be 10% opacity or greater;
- Bags or cartridges are ruptured; or
- Bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of the baghouse/filter system inspection in accordance with monitoring and recordkeeping permit condition. The records shall include a description of any corrective action that was taken, whether visible emissions were present, and if visible emissions were present the results of visible emission observation as determined by procedures contained in IDAPA 58.01.01.625.

Any changes to the Cyclone and Baghouse/Filter System Procedures document shall be submitted within 15 days of the change. The Cyclone and Baghouse/Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

[PTC No. P-2007.0107, XX/XX/2022]

**Monitoring and Recordkeeping Requirements**

**6.5** The operating and monitoring requirements specified in the Cyclone and Baghouse/Filter System Document are incorporated by reference to this permit and are enforceable permit conditions.

[PTC No. P-2007.0107, XX/XX/2022]
7. Compression Ignition Emergency Internal Combustion Engine (Emergency Generator Engine)

Summary Description

7.1 The permittee shall comply with all applicable requirements of 40 CFR 63, Subpart ZZZZ and all applicable general provisions of 40 CFR 63 Subpart A.

Subpart ZZZZ applies to the existing stationary Reciprocating Internal Combustion Engine (RICE) located at area source of HAP emissions. Subpart ZZZZ applies to the existing emergency compression ignition engine with a rated capacity of 270 bhp. Bennett Lumber Products maintains a John Deere, 6081AF001, 270 bhp compression ignition engine onsite for emergency purposes.

Compliance Date

7.2 In accordance with 40 CFR 63.6595(a)(1), the affected source must comply with the applicable emission and operating limitations of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ by May 3, 2013.

[Emissions and Operating Limitations]

Emissions and Operating Limitations

7.3 In accordance with 40 CFR 63.6603(a), on and after May 3, 2013, the following emission limits or operating restrictions are required for the engine. The permittee must meet the following requirements, except during periods of startup.

- Change oil and filter every 500 hours of operation or annually, whichever comes first.
- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6603(a); PTC No. P-2007.0107, XX/XX/2022]

7.4 On and after May 3, 2013, the permittee shall operate and maintain the diesel engine(s) and associated pollution control equipment (where applicable) in a manner that minimizes emissions. Nothing further is required to reduce emissions other than what is necessary to meet the appropriate limitation in the Emissions Limitations permit condition in accordance with 40 CFR 63.6605.

[40 CFR 63.6605; PTC No. P-2007.0107, XX/XX/2022]

Monitoring and Recordkeeping Requirements

7.5 In accordance with 63.6625(e)(3) and Table 6 of the subpart, on and after May 3, 2013, the permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e)(3); PTC No. P-2007.0107, XX/XX/2022]
7.6 In accordance with 63.6625(f), on and after May 3, 2013, an existing emergency stationary RICE located at an area source of HAP emissions must install a non-resettable hour meter if one is not already installed.

[40 CFR 63.6625(f); PTC No. P-2007.0107, XX/XX/2022]

7.7 On and after May 3, 2013, the engine's time spent at idle during startup shall be minimized to a period needed for appropriate and safe loading of the engine, but not to exceed 30 minutes, after which time the emission standards associated with this permit apply in accordance with 40 CFR 63.6625(h).

[40 CFR 63.6625(h); PTC No. P-2007.0107, XX/XX/2022]

7.8 In accordance with 40 CFR 63.6625(i), on and after May 3, 2013, the permittee has the option of implementing an oil analysis program to extend the specified oil change frequency in the Emissions and Operating Limitations permit condition. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The limits for these parameters are as follows: Total Base Number is less than 30% of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20% from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil before continuing to use the engine. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

[40 CFR 63.6625(i); PTC No. P-2007.0107, XX/XX/2022]

7.9 In accordance with 40 CFR 63.6640(f), the permittee must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1) through (4) of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1) through (4) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1) through (4) of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability...
Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see §63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(4) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.

(ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

[40 CFR 63.6640(f)]
Reporting Requirements

7.10 In accordance with 40 CFR 63.6655(e), the permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following RICE; (1) an existing stationary emergency RICE, (2) an existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

In accordance with 40 CFR 63.6655(f), an existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If engines are used for demand response, the permittee must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

All records shall be readily accessible in hard copy or electronic form for a minimum of five (5) years after the date of each occurrence, measurement, maintenance procedure, corrective action or report in accordance with 40 CFR 63.6660.

[40 CFR 63.6655(e), 63.6660; PTC No. P-2007.0107, XX/XX/2022]
8. 40 CFR 64 – Compliance Assurance Monitoring

Summary Description

8.1 The purpose of this section of the permit is to include all of the applicable requirements of 40 CFR 64, “Compliance Assurance Monitoring” (CAM). CAM requires selecting compliance indicators that when operated within specified ranges provide a reasonable assurance of compliance. CAM also requires monitoring, record keeping, and reporting requirements.

8.2 Table 8.1 lists the emissions units and pollutants that are applicable to CAM and details the monitoring requirements for each emissions unit which the permittee shall comply with. The table also specifies the specific values that are approved to determine when an excursion has occurred.

- Emissions Unit: Hog Fuel Boiler/Zurn Industries multiclone followed by Zurn wet scrubber with cyclone separator
- Regulated Pollutants: PM and PM$_{10}$

<table>
<thead>
<tr>
<th>INDICATOR</th>
<th>Wet Scrubber Pressure Drop (Measured as the ID fan outlet static pressure)</th>
<th>Wet Scrubber Water Flow Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>MONITORING DESIGN</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Measurement Approach</td>
<td>The ID fan outlet pressure gauge is located at the ID fan outlet just upstream of the wet scrubber inlet. It represents the pressure drop across the wet scrubber, because gauge pressure downstream of the scrubber is zero since it exhausts to the atmosphere.</td>
<td>The scrubber water flow is measured using a flow meter located in the water supply header to the scrubber nozzles. Scrubber flow is determined by direct observation of the meter gauge.</td>
</tr>
<tr>
<td>Indicator Ranges</td>
<td>An excursion is defined as a pressure of less than 0.5 inches of water or greater than 7.5 inches of water.</td>
<td>An excursion is defined as a scrubber water flow of less than 350 gpm.</td>
</tr>
</tbody>
</table>

PERFORMANCE CRITERIA

Data Representativeness

- The ID fan outlet pressure is located upstream from the wet scrubber. The monitor gauge is marked in 0.5 in. H$_2$O increments.
- The scrubber water flow meter is located in the water supply header. Manufacturer’s specifications indicate the gauge is accurate to +/- 5% of actual flow

QA/QC Practices

- Instrumentation is calibrated annually. It is observed daily; troubleshooting and maintenance will be initiated at any sign of questionably effective operation
- No calibration required per manufacturer’s specifications. Instrument is observed daily, troubleshooting, maintenance, or replacement will be initiated at any sign of questionably effective operation

Monitoring Frequency

- The ID fan outlet pressure is monitored continuously and recorded a minimum of once per day.
- The wet scrubber water flow is monitored continuously and recorded a minimum of once per day.

Data Collection Procedure

- The pressure shall be manually recorded in the boiler operating log.
- The flow rate shall be manually recorded in the boiler operating log.

Averaging Period

- Instantaneous (never to be exceeded)
- Instantaneous (never to be exceeded)

---

a) Excursion is defined in 40 CFR 64 as a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring.

[40 CFR 64.3(a)]
8.3 Performance Testing Operations

The permittee may conduct additional performance tests during the permit term to revise the allowable ID fan outlet (scrubber inlet) pressure or the minimum scrubbing media flow rate so long as the performance tests conform to all the requirements of this permit and the performance tests demonstrate compliance with the PM$_{10}$ pound per hour limit and the grain loading standard for the Zurn hog-fuel boiler while operating at the alternative operating parameters.

- The performance test shall be conducted in accordance with the Test Methods and Procedures specified in the Rules (IDAPA 58.01.01.157) and in accordance with a DEQ-approved source test protocol.
- The permittee may request to operate outside of the operating parameters specified by the manufacturer during the performance test by submitting a written source test protocol to DEQ for approval and requesting to operate under alternative operating parameters for the duration of the test.
- The protocol shall describe how the operating parameters will be monitored during the performance test.
- Once the source test is completed the permittee may request in writing to operate in accordance with alternative operating parameters. The request shall include a source test report and justification for the alternative operating parameters.

CAM Recordkeeping

8.4 In accordance with 40 CFR 64.7(a), the permittee shall conduct the monitoring required under this permit upon issuance.

[40 CFR 64.7(a)]

8.5 In accordance with 40 CFR 64.7(b), at all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[40 CFR 64.7(b)]

8.6 In accordance with 40 CFR 64.7(c) - except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments) - the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the hog fuel boiler is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of CAM, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c)]

8.7 In accordance with 40 CFR 64.7(d), upon detecting an excursion or exceedance, the permittee shall restore operation of the emissions unit(s) (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an
excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

[40 CFR 64.7(d)]

8.8 In accordance with 40 CFR 64.3(b), for the description of the control device(s) (e.g., multiclone in series with a wet scrubber and cyclone separator), if the manufacturer specifications for the monitoring devices for indicator 1 (e.g., pressure drop) and indicator 2 (e.g., scrubbing media flow rate) include calibration procedures but do not specify a calibration frequency, the device shall be calibrated at least once each calendar year.

[40 CFR 64.3(b)(1), (2), and (3)]

8.9 In accordance with 40 CFR 64.6(c)(2), an excursion shall be defined as any measured monitoring parameter which is outside the indicator ranges specified for the emissions unit in Table 8.1.

[40 CFR 64.6(c)(2)]

8.10 In accordance with 40 CFR 64.7(e), if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the permitting authority and, if necessary, submit a proposed modification to this operating permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7(e)]

8.11 In accordance with 40 CFR 64.8(a), the permittee shall develop and implement a quality improvement plan (QIP) if an accumulation of exceedances or excursions exceeds 5 percent duration of hog fuel boiler's operating time for a reporting period.

[40 CFR 64.8(a)]

8.12 In accordance with 40 CFR 64.9(a)(2), the reports required by the Semiannual Monitoring Reports and Reporting Deviations and Excess Emissions General Provisions shall include the following information for those emissions units listed in Table 8.1.

- Summary information on the number, duration, and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken.
- Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable).

[40 CFR 64.9(a)(2)]

8.13 In accordance with 40 CFR 64.9(b), the permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring or records of monitoring maintenance or corrective actions).

[40 CFR 64.9(b)]
8.14 Should there be a conflict between 40 CFR 64 and any of Permit Conditions of this CAM section, the 40 CFR 64 shall govern.
9. Insignificant Activities

9.1 Table 9.1 lists the units or activities that are insignificant on the basis of size or production rate. The regulatory citation for units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

<table>
<thead>
<tr>
<th>All Sources Listed Below are Insignificant Activities in accordance with IDAPA 58.01.01.317.01.b</th>
</tr>
</thead>
<tbody>
<tr>
<td>Truck bark bin</td>
</tr>
<tr>
<td>Auxiliary fuel bin</td>
</tr>
<tr>
<td>Rock storage</td>
</tr>
<tr>
<td>Hog fuel out-feed conveyor</td>
</tr>
<tr>
<td>Boiler bark conveyor</td>
</tr>
<tr>
<td>Auxiliary fuel bin conveyor</td>
</tr>
<tr>
<td>Bark hog</td>
</tr>
<tr>
<td>2,000-gallon gasoline tank</td>
</tr>
<tr>
<td>30-gallon parts washer 1</td>
</tr>
<tr>
<td>1,000-gallon used oil tank</td>
</tr>
</tbody>
</table>

9.2 There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in facility-wide permit conditions of this permit.

General Compliance

10.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.

[IDAPA 58.01.01.322.15.a; 40 CFR 70.6(a)(6)(i)]

10.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.

[IDAPA 58.01.01.322.15.b; 40 CFR 70.6(a)(6)(ii)]

10.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

[IDAPA 58.01.01.315.01; 40 CFR 70.5(b)]

Reopening

10.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.

[IDAPA 58.01.01.322.15.c; IDAPA 58.01.01.386; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

10.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[IDAPA 58.01.01.322.15.d; 40 CFR 70.6(a)(6)(iii)]

Property Rights

10.6 This permit does not convey any property rights of any sort or any exclusive privilege.

[IDAPA 58.01.01.322.15.e; 40 CFR 70.6(a)(6)(iv)]

Information Requests

10.7 The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122; IDAPA 58.01.01.322.15.f; 40 CFR 70.6(a)(6)(v)]

10.8 Upon request, the permittee shall furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g; IDAPA 58.01.01.128; 40 CFR 70.6(a)(6)(v)]
Severability

10.9 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 58.01.01.322.15.h; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

10.10 The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200–223; IDAPA 58.01.01.322.15.i; IDAPA 58.01.01.380–386; 40 CFR 70.4(b)(12), (14), (15); 40 CFR 70.7(d), (e)]

10.11 Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the Clean Air Act (CAA), 42 United States Code (U.S.C.) Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381–385; IDAPA 58.01.01.209.05; 40 CFR 70.4(b)(14), (15)]

Federal and State Enforceability

10.12 Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j; 40 CFR 70.6(b)(1), (2)]

10.13 Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k]
Inspection and Entry

10.14 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 a Tier I source is located, or 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; IDAPA 58.01.01.322.15.l; 40 CFR 70.6(c)(2)]

New Applicable Requirements

10.15 The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10; IDAPA 58.01.01.314.10.a.ii; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

10.16 The permittee shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387; 40 CFR 70.6(a)(7)]

Certification

10.17 All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

10.18 The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the permittee is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03; 40 CFR 70.5(a)(1)(iii)]

10.19 If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit, including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325, shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p; 40 CFR 70.7(b)]
Permit Shield

10.20 Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
- DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
  - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;
  - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
  - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122; IDAPA 58.01.01.322.15.m; IDAPA 58.01.01.325; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

10.21 The permittee shall comply with the following:

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10; IDAPA 58.01.01.314.9; IDAPA 58.01.01.314.10; 40 CFR 70.6(c)(3) and (4)]
Periodic Compliance Certification

10.22 The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:

- The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
- The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit, including emissions limitations, standards, and work practices;
- The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
  - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
  - The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
  - The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
  - Such information as DEQ may require to determine the compliance status of the emissions unit.

10.23 All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

False Statements

10.24 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.

No Tampering

10.25 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.
Semiannual Monitoring Reports

10.26  In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q; IDAPA 58.01.01.322.08.c; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

10.27  The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130–136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q; IDAPA 58.01.01.135; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

10.28  No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b; 40 CFR 70.6(a)(8)]

Emergency

10.29  In accordance with IDAPA 58.01.01.332, an “emergency”, as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01; 40 CFR 70.6(g)]