



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

August 18, 2003

Certified Mail No.: 7099 3220 0009 1976 2439

Kevin Greenleaf
Louisiana-Pacific Corporation
P.O. Box 108
Moyie Springs, ID 83845

RE: AIRS Facility No. 021-00001, Louisiana Pacific, Moyie Springs
Final Permit to Construct Reissuance

Dear Mr. Greenleaf:

The Idaho Department of Environmental Quality (Department) is issuing Permit to Construct (PTC) Number P-030119 for Louisiana-Pacific Corp, Moyie Springs in accordance with IDAPA 58.01.01.200 through 228 (*Rules for the Control of Air Pollution in Idaho*). This permit is effective immediately and is based on your permit application received on June 16, 2003.

This permit does not release Louisiana-Pacific Corp, Moyie Springs from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Tom Harman of the Coeur d'Alene Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

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

Sincerely,

A handwritten signature in black ink, appearing to read "C. Stephen Allred".

C. Stephen Allred, Director
Idaho Department of Environmental Quality

CSA/DPS/sd

Permit No. P-030119

Enclosures

cc: Tom Harman, Coeur d'Alene Regional Office
Sherry Davis, Air Quality Division
Laurie Kral, EPA Region 10
Daniel Salgado, Permit Coordinator
Marilyn Seymore, Permit File
Pat Rayne, AFS
Phyllis Heitman, (Ltr Only)
Reading File (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: P-030119

AIR FACILITY NO.: 021-00001

AQCR: 63

CLASS: A

SIC: 2421

ZONE: 11

UTM COORDINATE (km): 559.44, 5396.76

1. PERMITTEE

Louisiana-Pacific Corporation

2. PROJECT

Sawmill Equipment Modifications (Re-issuance)

3. MAILING ADDRESS

P.O. Box 108

CITY

Moyie Springs

STATE

ID

ZIP

83845

4. FACILITY CONTACT

Jim Perry

TITLE

Plant Manager

TELEPHONE

(208) 267-3166

5. RESPONSIBLE OFFICIAL

Bruce Mallory

TITLE

Lumber General Manager

TELEPHONE

(208) 821-5263

6. EXACT PLANT LOCATION

Old Highway 2 (see UTM coordinates)

COUNTY

Boundary

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Lumber Manufacturing, Dimensional Lumber

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require Department approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

**G. STEPHEN ALLRED, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: August 18, 2003

Acronyms, Units, and Chemical Nomenclature

| | |
|-------------------|--|
| acfm | actual cubic feet per minute |
| AFS | AIRS Facility Subsystem |
| AIRS | Aerometric Information Retrieval System |
| AQCR | Air Quality Control Region |
| ASTM | American Society for Testing and Materials |
| BACT | Best Available Control Technology |
| Btu | British thermal unit |
| CAA | Clean Air Act |
| CFR | Code of Federal Regulations |
| CO | carbon monoxide |
| Department | Department of Environmental Quality |
| dscf | dry standard cubic feet |
| EPA | U.S. Environmental Protection Agency |
| gpm | gallons per minute |
| gr | grain (1 lb = 7,000 grains) |
| HAPs | hazardous air pollutants |
| hp | horsepower |
| IDAPA | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| km | kilometer |
| lb/hr | pound per hour |
| m | meter(s) |
| MACT | Maximum Achievable Control Technology |
| MMBtu | million British thermal units |
| MMBtu/hr | million British thermal units per hour |
| NESHAP | National Emission Standards for Hazardous Air Pollutants |
| NO ₂ | nitrogen dioxide |
| NO _x | nitrogen oxides |
| NSPS | New Source Performance Standards |
| O ₃ | ozone |
| PM | particulate matter |
| PM ₁₀ | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers |
| ppm | parts per million |
| PSD | prevention of significant deterioration |
| PTC | permit to construct |
| PTE | potential to emit |
| <i>Rules</i> | <i>Rules for the Control of Air Pollution in Idaho</i> |
| scf | standard cubic feet |
| SIC | Standard Industrial Classification |
| SIP | State Implementation Plan |
| SO ₂ | sulfur dioxide |
| SO _x | sulfur oxides |
| TSP | total suspended particulate |
| T/yr | tons per year |
| µg/m ³ | micrograms per cubic meter |
| UTM | Universal Transverse Mercator |
| VOC | volatile organic compound |

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| Location: Moyie Springs | | |

1. PERMIT TO CONSTRUCT SCOPE

Purpose

This PTC incorporates and replaces the following permit:

- PTC No. 021-00001, issued July 23, 2001

Regulated Sources

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

Table 1.1 REGULATED EMISSIONS SOURCES

| Permit Section | Source Description | Emissions Control(s) |
|-----------------------|---------------------------|-----------------------------|
| 2 | Kilns 1-4 | Uncontrolled |

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2. KILNS 1-4

2.1 Process Description

The primary purpose of the kilns is to dry lumber. This permit is for the replacement of the current log infeed with a double length infeed, the replacement of two edgers with a single high-speed edger, and for some rearranging of equipment inside the mill to improve material flow.

2.2 Emissions Control Description

Emissions from the kilns are uncontrolled.

Table 2.1 KILN DESCRIPTION

| Emissions Unit(s) / Process(es) | Emissions Control Device | Emissions Point |
|---------------------------------|--------------------------|-----------------|
| Kilns 1-4 | Uncontrolled | Kilns 1-4 vents |

Emissions Limits

2.3 Emissions Limits

The combined formaldehyde emissions from the kilns shall not exceed 0.49 tons per any consecutive 12-month period.

2.4 Opacity Limit

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

Operating Requirements

2.5 Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651, *Rules for the Control of Air Pollution in Idaho*. Visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period.

Monitoring and Recordkeeping Requirements

2.6 Throughput Monitoring

Each month, the permittee shall monitor and record the throughput of each kiln for each category of lumber processed during that month and for the most recent 12-month period. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

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2.7 Monitor Operating Parameters

The permittee shall calculate the information required in Permit Condition 2.7.1 by multiplying the throughput for each category of lumber as obtained in accordance with Permit Condition 2.6, by the appropriate emission factor listed in Permit Conditions 2.7.2 and 2.7.3. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

- 2.7.1 Each month the permittee shall calculate the formaldehyde emissions from the kilns in pounds per month for that month, and tons per the most recent 12-month period.
- 2.7.2 The following emissions factors, in pounds of formaldehyde per thousand board-feet (lb/Mbdf), shall be used to calculate the formaldehyde emissions: a) Fir/Larch, 0.0011 lb/Mbdf; b) Hem/Fir, 0.0028 lb/Mbdf; and c) Ponderosa pine, 0.0029 lb/Mbdf.
- 2.7.3 Any lumber category processed in the kilns, but not listed in Permit Condition 2.7.2, shall be subject to a formaldehyde emissions factor of 0.0040 lb/Mbdf. The permittee may request, in writing, Department approval for the use of emissions factors not listed in this permit. In the case of Department-approved emissions factors, a written copy of the Department's approval(s) shall be kept onsite at the facility.

2.8 Opacity Monitoring

The permittee shall conduct a monthly inspection of the kiln vents during daylight hours and under normal operating conditions. The length of observation shall be no less than 10 minutes. In the event any level of visible emissions are present in excess of 10% opacity, the permittee shall perform a visible emissions reading by a certified visible emissions reader in accordance with the procedures contained in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136 if applicable. If four consecutive readings indicate that opacity is below 20%, the required frequency of observations shall decrease to once per quarter. If any quarterly Method 9 observation indicates opacity is greater than 20%, the observation frequency shall revert back to monthly. The permittee shall maintain records of the results of each monthly and/or quarterly visible emission 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 visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

2.9 Fugitive Dust Monitoring

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

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- 2.9.3 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. The inspection shall consist of a see/no see evaluation for each potential source of fugitive emissions. If any fugitive emissions are present, the permittee shall perform a Method 22 visible emissions test at the property boundary in accordance with the procedures outlined in IDAPA 58.01.01.625. If fugitive emissions are observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action as expeditiously as practicable and report the exceedance to the Department within 72 hours. The permittee shall maintain records of the results of each quarterly fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Reporting Requirements

- 2.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions.

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3. SUMMARY OF EMISSIONS LIMITS

Table 3.1 provides a summary of all emissions limits required by this permit:

Table 3.1 SUMMARY OF EMISSIONS LIMITS

| Louisiana-Pacific Corp, Moyie Springs Emissions Limits^a - Annual^b (T/yr) | |
|---|---------------------|
| Source Description | Formaldehyde |
| | T/yr |
| Kilns 1-4 | 0.49 |

- ^a As determined by a pollutant-specific EPA reference method, Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.
- ^b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emissions rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates. The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

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4. EMISSIONS INVENTORY

The following table is a summary of the emissions increases and decreases associated with permit reissuance. The emissions inventory table is provided for informational purposes only.

Table 4.1 EMISSIONS INVENTORY

| Pollutant | Annual Emissions Increase (T/yr) | Annual Emissions Decrease (T/yr) | Change in Annual Emissions (T/yr) |
|---------------------|---|---|--|
| NO _x | N/A | N/A | N/A |
| SO ₂ | N/A | N/A | N/A |
| CO | N/A | N/A | N/A |
| PM/PM ₁₀ | N/A | N/A | N/A |
| VOC | N/A | N/A | N/A |
| TAPS/ HAPS | N/A | N/A | N/A |
| Total: | 0 | 0 | 0 |

*TAPS/HAPS = toxic air pollutants / hazardous air pollutants

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5. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for the Control of Air Pollution in Idaho*. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq., and the permittee is subject to penalties for each day of noncompliance.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify the Department, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If compliance testing is specified, the permittee must schedule and perform such testing within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup. This requirement shall be construed as an ongoing requirement. The permittee shall not operate the source without testing within 180 days. If testing is not conducted within 180 days after initial startup, then each day of operation thereafter without the required compliance test constitutes a violation. Such testing must **strictly** adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from the Department. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.
7. 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.

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8. In accordance with IDAPA 58.01.01.123, all documents submitted to the department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.