



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

Brad Little, Governor  
John Tippets, Director

April 14, 2020

Rande Smith, General Manager  
Silver Valley Forest Products, LTD  
P.O. Box 39  
Smelterville, Idaho 83868

RE: Facility ID No. 079-00006, Project No. 62424, Silver Valley Forest Products, LTD,  
Smelterville  
Transfer of Ownership by Permit to Construct Revision

Dear Mr. Smith:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2020.0014, Project 62424 to Silver Valley Forest Products, LTD, located in Smelterville for a transfer of ownership. This PTC is issued in accordance with IDAPA 58.01.01.209.04 of the Rules for the Control of Air Pollution in Idaho and is based on the certified information received on April 7, 2020. The transfer of ownership is based on the following information:

**Previous Permittee Information**

Permittee:	Enyeart Cedar Products LLC
Mailing Address:	P.O. Box 490, Coeur d'Alene, Idaho 83816-0490
Facility Location:	UTM Coordinates (km) 562.7, 5265.8
Facility Contact:	Ron Enyeart, Responsible Official
Phone Number:	(503) 970-8484
E-mail Address:	ron@enyeartcedar.com
Responsible Official:	Ron Enyeart, Responsible Official
Phone Number:	(503) 970-8434

**Updated Permittee Information**

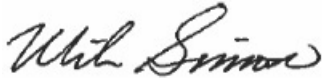
Permittee:	Silver Valley Forest Products, LTD
Mailing Address:	P.O. Box 39, Smelterville, Idaho 83868
Facility Location:	163 E. Commerce Drive, Smelterville, Idaho 83868
Facility Contact:	Rande Smith, General Manager
Phone Number:	(208) 453-6897
E-mail Address:	dsauer@silvervalleyforest.com and rsmith@silvervalleyforest.com
Responsible Official:	Rande Smith, General Manager
Phone Number:	(208) 453-6897

This permit is effective immediately and replaces PTC No. P-2020.0014, Project 62413, issued March 23, 2020. This permit does not release Silver Valley Forest Products, LTD from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Air Quality Compliance Officer, at (208) 666-4600 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

If you have any questions, please contact Christina Boulay at (208) 373-0575 or [christina.boulay@deq.idaho.gov](mailto:christina.boulay@deq.idaho.gov).

Sincerely,

A handwritten signature in cursive script that reads "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\cb

Permit No. P-2020.0014 PROJ 62424

Enclosures

# Air Quality

## PERMIT TO CONSTRUCT

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**Permittee** Silver Valley Forest Products, LTD  
**Permit Number** P-2020.0014  
**Project ID** 62424  
**Facility ID** 079-00006  
**Facility Location** 163 E. Commerce Drive  
Smelterville, Idaho 83868

### Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

**Date Issued** April 14, 2020

*Christina Boulay*  
Christina Boulay, Permit Writer

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*Mike Simon*

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Mike Simon, Stationary Source Manager

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# 1 Permit Scope

## Purpose

- 1.1 This is a change of ownership permit transfer to Silver Valley Forest Products, LTD from Enyeart Cedar Products, LLC.
- 1.2 This PTC replaces Permit to Construct No. P-2020.0014, issued on March 23, 2020.

## Regulated Sources

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

**Table 1.1 Regulated Sources**

Permit Section	Source	Control Equipment
2	<u>Moore Oregon Lumber Dry Kiln:</u> Maximum capacity is 6,250 bdf/hr, annual throughput is limited to 13E006 bdf/yr	None
	<u>Maxon Natural Gas-Fired Burner:</u> Maximum input heat rate is 3.5 MMBtu/hr	Reasonable Control

## 2 Natural Gas-Fired Dry Kiln and Other Fugitive Sources

### 2.1 Process Description

Green lumber is dried in the dry kiln. The dry kiln is directly heated by a natural gas-fired burner with a rated heat input capacity of 3.5 MMBtu/hr. Lumber drying is a batch process. The allowable dried lumber throughput of the dry kiln is 13.0 MMbdf/yr.

### 2.2 Control Device Descriptions

**Table 2.1 Natural Gas-Fired Burner and Dry Kiln Description**

Emissions Units / Processes	Control Devices
<u>Moore Oregon Lumber Dry Kiln:</u> Maximum capacity is 6,250 bdf/hr, annual throughput is limited to 13E006 bdf/yr	None
<u>Maxon Natural Gas-Fired Burner:</u> Maximum input heat rate is 3.5 MMBtu/hr	

## Emission Limits

### 2.3 Emission Limits

The emissions from the Natural Gas-Fired Burner and Dry Kiln stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

**Table 2.2 Natural Gas-Fired Burner and Dry Kiln Emission Limits<sup>(a)</sup>**

Source Description	PM <sub>10</sub> <sup>(b)</sup>	VOC
	T/yr <sup>(c)</sup>	T/yr <sup>(c)</sup>
Lumber Dry Kiln	0.72	9.75
Natural Gas-Fired Burner	0.09	0.08
<b>Total Emissions</b>	<b>0.80</b>	<b>9.83</b>

- 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) Tons per any consecutive 12-calendar month period.

### 2.4 Opacity Limit

Emissions from the Natural Gas-Fired Burner and Dry Kiln stack, or any other stack, vent, or functionally equivalent opening associated with the Natural Gas-Fired Burner and Dry Kiln, 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 Throughput Limits

The maximum annual dried lumber throughput of the dry kiln shall not exceed 13,000,000 board feet per any consecutive 12-month period (bdf/yr).

### 2.6 Burner Fuel

Only Natural Gas shall be combusted in the dry kiln burner.

## **2.7 Fugitive Control**

- 2.7.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
  - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
  - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
  - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
  - Paving of roadways and their maintenance in a clean condition, where practical.
  - Prompt removal of earth or other stored material from streets, where practical.
- 2.7.2 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.
- 2.7.3 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.
- 2.7.4 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. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain, 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.

## **Monitoring and Recordkeeping Requirements**

### **2.8 Throughput Monitoring**

The permittee shall monitor and record the dried lumber throughput monthly. Monthly throughputs shall be summed over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 2.5. Records of this information shall be kept on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

## **Reporting Requirements**

### **2.9 Exceedance Reports**

The permittee shall report any exceedances of any operating requirement of this permit in writing to the DEQ within five days of discovery of the exceedance. Included in this report shall be a description of any corrective action taken to remedy the cause of the exceedance.



### 3 General Provisions

#### General Compliance

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

[Idaho Code §39-101, et seq.]

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

[IDAPA 58.01.01.211, 5/1/94]

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

[IDAPA 58.01.01.212.01, 5/1/94]

#### Inspection and Entry

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

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

[Idaho Code §39-108]

#### Construction and Operation Notification

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

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

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

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

[IDAPA 58.01.01.211.01, 5/1/94]

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

[IDAPA 58.01.01.211.03, 5/1/94]

## **Performance Testing**

**3.7** If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

**3.8** All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

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

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

## **Monitoring and Recordkeeping**

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

[IDAPA 58.01.01.211, 5/1/94]

## **Excess Emissions**

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

[IDAPA 58.01.01.130–136, 4/5/00]

## **Certification**

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

[IDAPA 58.01.01.123, 5/1/94]

## **False Statements**

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

[IDAPA 58.01.01.125, 3/23/98]

## **Tampering**

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

[IDAPA 58.01.01.126, 3/23/98]

## **Transferability**

- 3.15** This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

## **Severability**

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

[IDAPA 58.01.01.211, 5/1/94]