



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

C.L. "Butch" Otter, Governor  
Curt Fransen, Director

January 16, 2015

Daniel McFall  
Chief Operating Officer  
520 SW Yamhill St., Suite 700  
Portland, Oregon 97204

RE: Facility ID No. 017-00001, Stimson Lumber Company, Priest River  
Final Permit Letter

Dear Mr. McFall:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2008.0062 Project 61431 to Stimson Lumber Company located at Priest River for the addition of the newly applicable requirements for the boilers. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received September 24, 2014.

This permit is effective immediately and replaces PTC No. P-2008.0062 issued January 3, 2013. This permit does not release Stimson Lumber Company 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 Mr. Almer Casile, Air Quality Analyst, at (208) 769-1422 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.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Dan Pitman at (208) 373-0502 or [daniel.pitman@deq.idaho.gov](mailto:daniel.pitman@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\DP

Permit No. P-2008.0062 PROJ 61431

Enclosures

**AIR QUALITY**  
**PERMIT TO CONSTRUCT**

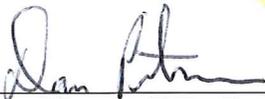
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**Permittee**                      Stimson Lumber Company, Priest River  
**Permit Number**                P-2008.0062  
**Project ID**                     61431  
**Facility ID**                     017-00001  
**Facility Location**             12 Old Priest River Road  
   Priest River, Idaho 83856

**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**                      January 16, 2015



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**Dan Pitman, P.E., Permit Writer**



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**Mike Simon, Stationary Source Manager**

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# 1. PERMIT SCOPE

## Purpose

- 1.1 This permitting action is to add the provisions of 40 CFR 63 Subpart JJJJJ to the permit, clarify source testing requirements for the wood fired boilers, and clarify the particulate matter standard that applies to the wood fired boilers. [1/16/15]
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin. [1/16/15]
- 1.3 This PTC replaces Permit to Construct No. P-2008.0062 Project No. 61134, issued January 3, 2013. [1/16/15]
- 1.4 The emission sources regulated by this permit are listed in the following table.

Table 1 REGULATED SOURCES

Source Descriptions	Emission Controls
EPI Boiler	Multiclone and ESP
Wellons Boiler	Multiclone
Drying Kilns	None
Cyclones and Target Boxes	None
Bin 6 and Bin 8 cyclone exhaust	90% or better efficiency control device(s) as certified by the manufacturer

## 2. FACILITY-WIDE CONDITIONS

### 2.1 Opacity Limit

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, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

### 2.2 Visible Emissions/Opacity Monitoring

The permittee shall conduct a monthly 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 action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

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.

All records shall be maintained on-site for a period of 5 years and shall be made available to DEQ representatives upon request.

### 2.3 Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. 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.

#### 2.4 Fugitive Dust Monitoring

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.

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.

The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (If observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

### 3. EPI FLUIDIZED BED BOILER AND WELLONS GRATE BOILER

#### 3.1 Process Description

Steam from the EPI fluidized bed boiler and Wellons grate boiler is used to dry lumber in the kilns and operate some pneumatically-powered tools.

Exhaust is drawn from the EPI fluidized bed boiler to the multiclone using an induced draft fan where larger particles are removed from the air stream and recycled to the boilers inlet. After the multiclone, exhaust gas is pushed through the PPC electrostatic precipitator by a forced draft fan – approximately 80% of the particulate is captured at the PPC ESP before the exhaust gas is discharged to the atmosphere. As a result of the rapping mechanism, particulate matter accumulated on the plates is dropped into a storage hopper located below the PPC ESP.

The Wellons grate boiler exhaust has a multiclone to control its particulate emissions.

#### 3.2 Emission Controls Description

**Table 2 BOILERS DESCRIPTION**

Emissions Units / Processes	Emission Control Devices	Emission Points
EPI boiler	Multiclone and PPC Electrostatic Precipitator (PPC ESP)	HFB-1 Boiler stack
Wellons boiler	Multiclone	HFB-2 Boiler stack

#### Emission Limits

##### 3.3 Emission Limits

The PM<sub>10</sub>, NO<sub>x</sub> and CO emissions from the EPI boiler stack shall not exceed any emissions rate limit in the following table. The PM<sub>10</sub>, NO<sub>x</sub> and CO emissions from the Wellons boiler stack shall not exceed any emissions rate limit in the following table.

**Table 3 BOILERS EMISSION LIMITS<sup>a</sup>**

Source Description	PM <sub>10</sub> <sup>b</sup>		NO <sub>x</sub>		CO	
	lb/hr <sup>c</sup>	T/yr <sup>d</sup>	lb/hr <sup>c</sup>	T/yr <sup>d</sup>	lb/hr <sup>c</sup>	T/yr <sup>d</sup>
EPI boiler	7.94	34.78	9.19	40.25	15.53	63.65
Wellons boiler	6.192	27.12	6.43	28.16	4.08	17.87

- a) In absence of any other credible evidence, compliance is assured 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 method, or DEQ-approved alternative.
- d) Tons per any consecutive 12-calendar month period.

##### 3.4 Visible Emissions Limit

The visible emission from each boiler's stack shall comply with the Facility-wide Conditions for visible emissions of this Permit.

- 3.5 In accordance with IDAPA 58.01.01.676 the permittee shall not discharge into the atmosphere from any wood product fuel burning equipment in operation prior to October 1, 1979 particulate matter in excess of a concentration of 0.200 grains per dry standard cubic foot corrected to 8 percent oxygen and for altitude in accordance with IDAPA 58.01.01.680.

[1/16/15]

### **Operating Requirements**

- 3.6 The EPI boiler shall not exceed maximum steam production rate of 16,870 pounds of steam per hour, based on a consecutive 3 hour average.

[1/3/13]

- 3.7 The Wellons boiler's steam production shall not exceed 140.2 MM lbs of steam on a 12-consecutive month rolling basis

- 3.8 The EPI and Wellons boilers shall be fired exclusively with hogged fuel.

- 3.9 Any fugitive emissions from the operations of either boiler shall comply with the Facility-wide Conditions for fugitive emissions of this Permit.

- 3.10 At all times when the EPI boiler is operating, the PPC ESP shall operate within the manufacturer's specifications, or the determined operational parameters from prior source tests, as stated in the Operations and Maintenance (O&M) manual.

- 3.11 PPC ESP Operations and Maintenance Manual Requirements

The permittee shall have developed and submitted to DEQ an Operations and Maintenance (O&M) manual for the PPC ESP which describes the procedures that will be followed to comply with General Provisions of this permit and the manufacturer specifications for the air pollution PPC ESP. The manual shall be a permittee developed document independent of the manufacturer supplied operating manual but may included summaries of procedures included in the manufacturer supplied operating manual.

The operation and monitoring requirements specified in the O&M manual are incorporated by reference to this permit and are enforceable permit conditions.

- 3.12 Wellons Boiler Multiclone Operations and Maintenance Manual Requirements

The permittee shall have developed and submitted to DEQ an Operations and Maintenance (O&M) manual for the multiclone which describes the procedures that will be followed to comply with General Provisions of this permit and the manufacturer specifications for the air pollution multiclone. The manual shall be a permittee developed document independent of the manufacturer supplied operating manual but may included summaries of procedures included in the manufacturer supplied operating manual.

The operation and monitoring requirements specified in the O&M manual are incorporated by reference to this permit and are enforceable permit conditions.

- 3.13 **40 CFR 63 Subpart JJJJJJ**

In accordance with 40 CFR 63.11223 (b) you must conduct a tune-up of the boilers biennially as specified in the following. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

- As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.

- Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).
- Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- Maintain on-site and submit, if requested, a report containing the following information:
  - The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
  - A description of any corrective actions taken as a part of the tune-up of the boiler.
  - The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period.
- If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

[1/16/15]

### 3.14 40 CFR 63 Subpart JJJJJJ

In accordance with 40 CFR 63.11205(a) at all times the permittee must operate and maintain any affected boiler, 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 the Permittee to make any further efforts to reduce emissions if levels required by 40 CFR 63 Subpart JJJJJJ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information 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.

[1/16/15]

## Monitoring and Recordkeeping Requirements

### 3.15 Visible Emissions Monitoring

The permittee shall conduct visible emissions monitoring in accordance with the Facility-wide Conditions for visible emissions monitoring of this Permit.

### 3.16 The permittee shall monitor and record all values established by the O&M manuals for the PPC ESP and multiclone.

### 3.17 Steam Production Monitoring

The permittee shall monitor and record steam production rate in pounds of steam per hour, based on a consecutive 3 hour average, to determine compliance with the Permit conditions of this section of the Permit.

The permittee shall monitor and record the steam production each day for the Wellons boiler and maintain a summary monthly. The summation of the 12 most recent monthly summaries of Wellons boiler's production shall determine the 12-month consecutive rolling basis and compliance with Permit Conditions of this section of the Permit.

### 3.18 Control Device Requirements

An ESP shall be used to control PM and PM<sub>10</sub> and opacity emissions from the EPI boiler

The permittee shall install, calibrate, maintain, and operate, in accordance with the O&M manual specifications, equipment to continuously measure the secondary voltage and secondary amperage applied by each transformer/rectifier set to the discharge electrodes while the boiler is operating.

The secondary voltage and amperage applied to each transformer-rectifier set shall be maintained as follows:

- Secondary Amperage Minimum – greater than zero
- Secondary Voltage Minimum – 30 kilovolts

The minimum secondary voltage must not be below 30 kilovolts for any 24 hour averaging period.

The permittee may establish new operating parameters by conducting a performance test that demonstrates compliance with the PM<sub>10</sub> emission limits, and visible emission limits for the EPI Boiler PPC ESP stack 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. All operating parameters specified in this permit condition shall be continuously monitored and recorded during each test run. The permittee may request to operate below the minimum voltage value specified by this permit during the performance test by submitting a written source test protocol to DEQ for approval and requesting to operate under alternative operating parameters during the duration of the 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. Upon receiving DEQ written approval of the source test and the requested alternative operating parameters, the permittee shall operate in accordance with those DEQ-approved alternative operating parameters. A copy of DEQ's approval shall be maintained on site with a copy of this permit.

The permittee shall revise this permit to reflect the operational parameters determine from the results of the DEQ approved source test.

### 3.19 Steam Production Monitor

The permittee shall calibrate, maintain and operate, in accordance with manufacturer specifications, a device that continuously monitors the steam production rate of the EPI Boiler and the Wellons Boiler.

### 3.20 At least once each calendar year, the permittee shall inspect the PPC ESP for physical degradation that could affect the performance of the PPC ESP. At a minimum, the permittee shall check the following components of the PPC ESP for damage or other condition that would reduce the efficiency:

- Discharge electrodes
- Collection electrodes
- Electrode alignment
- Rapper mechanisms for the electrodes
- Transformer-rectifier sets

The permittee shall record in a log (an electronic log is acceptable) the results of the inspection. The log shall contain the date of inspection, the identity of the inspector, the results of each inspection, and the date of any repairs made or corrective action taken.

## **40 CFR 63 Subpart JJJJJ**

3.21 In accordance with 40 CFR 63.11225(c)(1) and in accordance with 40 CFR 63.10(b)(2)(xiv), the Permittee must keep a copy of each notification and report that was submitted to comply with 40 CFR 63 Subpart JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted.

[1/16/15]

3.22 In accordance with 40 CFR 63.11225(c)(2) the Permittee must keep records to document that tune-ups of the boilers have been conducted biennially. In accordance with 40 CFR 63.1125(c)(2) records shall include:

- Identification of each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned - 40 CFR 63.1125(c)(2)(i).
- Copies of the energy assessments conducted on each boiler - 40 CFR 63.1125(c)(2)(iii).

[1/16/15]

3.23 In accordance with 40 CFR 63.11225(c)(4) the Permittee must keep records of the occurrence and duration of each malfunction of the boilers, or of the associated air pollution control and monitoring equipment.

[1/16/15]

3.24 In accordance with 40 CFR 63.11225(c)(5) the Permittee must keep records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 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.

[1/16/15]

3.25 In accordance with 40 CFR 63.11225(d) records must be in a form suitable and readily available for expeditious review. The Permittee must keep each record for 5 years following the date of each recorded action. The Permittee 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. The Permittee may keep the records off site for the remaining 3 years.

[1/16/15]

3.26 In accordance with 40 CFR 63.1125(f) & (g) if the Permittee intends to commence combustion of solid waste, switch fuels or make a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within 40 CFR 63 Subpart JJJJJ the Permittee shall comply with all applicable notification, reporting, and recordkeeping requirements.

[1/16/15]

## **Performance Testing Requirements**

### **3.27 Performance Testing**

The permittee shall conduct performance tests on the Wellons boiler stack, and the PPC ESP stack from the EPI boiler by May 31, 2017 in order to determine compliance with PM<sub>10</sub> pound per hour emission limits, the allowable particulate standard of 0.200 gr/dscf, and the visible emissions standard. The permittee shall furnish DEQ a written report of the results of the performance tests in accordance with General Provision 6.8.

Ongoing testing on the Wellons boiler stack in order to determine compliance with the PM<sub>10</sub> pound per hour emission limit shall be conducted according to the following schedule.

**TIERED TEST FREQUENCY**

Most Recent Performance Test Result	Next Test Required
Emissions are more than 90 percent of the applicable PM <sub>10</sub> standard.	Within 12 months of the most recent test
Emissions are between 75 and 90 percent of the applicable PM <sub>10</sub> standard.	Within three years of the most recent test
Emissions are less than 75 percent of the applicable PM <sub>10</sub> standard.	Within five years of the most recent test

Whenever performance testing is required by this schedule the permittee shall determine the PM<sub>10</sub> emissions rate in pounds per hour, and visible emissions using the methods and procedures contained in IDAPA 58.01.01.625

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

- The duration of each test run and the pounds of steam produced during each test run.

Ongoing testing on the Wellons boiler stack in order to determine compliance with the allowable particulate standard of 0.200 gr/dscf shall be conducted according to the following schedule.

**TIERED TEST FREQUENCY**

Most Recent Performance Test Result	Next Test Required
Emissions are more than 90 percent of the allowable particulate standard of 0.200 gr/dscf.	Within 12 months of the most recent test
Emissions are between 75 and 90 percent of the allowable particulate standard of 0.200 gr/dscf.	Within three years of the most recent test
Emissions are less than 75 percent of the allowable particulate standard of 0.200 gr/dscf.	Within five years of the most recent test

Whenever performance testing is required by this schedule, the permittee shall determine particulate matter emissions in grains per dry standard cubic feet corrected for oxygen and altitude as specified by IDAPA 58.01.01.675, and visible emissions using the methods and procedures contained in IDAPA 58.01.01.625

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

- The duration of each test run and the pounds of steam produced during each test run.

Ongoing testing on the PPC ESP stack from the EPI boiler in order to determine compliance with PM<sub>10</sub> pound per hour emission limit shall be conducted according to the following schedule.

**TIERED TEST FREQUENCY**

Most Recent Performance Test Result	Next Test Required
Emissions are more than 90 percent of the applicable PM <sub>10</sub> standard.	Within 12 months of the most recent test
Emissions are between 75 and 90 percent of the applicable PM <sub>10</sub> standard.	Within three years of the most recent test
Emissions are less than 75 percent of the applicable PM <sub>10</sub> standard.	Within five years of the most recent test

Whenever performance testing is required by this schedule the permittee shall determine the PM<sub>10</sub> emissions rate in pounds per hour and visible emissions using the methods and procedures contained in IDAPA 58.01.01.625.

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

- Power input to the ESP (the sum of the secondary voltage times secondary current for each transformer-rectifier (T/R) sets.
- The duration of each test run and the pounds of steam produced during each test run.

Ongoing testing on the PPC ESP stack from the EPI boiler in order to determine compliance with the allowable particulate standard of 0.200 gr/dscf shall be conducted according to the following schedule.

**TIERED TEST FREQUENCY**

Most Recent Performance Test Result	Next Test Required
Emissions are more than 90 percent of the allowable particulate standard of 0.200 gr/dscf.	Within 12 months of the most recent test
Emissions are between 75 and 90 percent of the allowable particulate standard of 0.200 gr/dscf.	Within three years of the most recent test
Emissions are less than 75 percent of the allowable particulate standard of 0.200 gr/dscf.	Within five years of the most recent test

Whenever performance testing is required by this schedule the permittee shall determine particulate matter emissions in grains per dry standard cubic feet corrected for oxygen and altitude as specified by IDAPA 58.01.01.675, and visible emissions using the methods and procedures contained in IDAPA 58.01.01.625.

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

- Power input to the ESP (the sum of the secondary voltage times secondary current for each transformer-rectifier (T/R) sets.
- The duration of each test run and the pounds of steam produced during each test run.

[1/16/15]

3.28 The permittee shall revise this permit to reflect the results determined from the DEQ approved source tests of the Wellons boiler stack and the PPC ESP stack from the EPI boiler if any permit conditions are exceeded.

[1/3/13]

**Reporting Requirements**

3.29 Performance Test Protocol

The permittee shall comply with the General Provisions.

The permittee is strongly encouraged to submit a compliance test protocol for approval at least 30 days prior to conducting any compliance test required by this permit. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the test does not satisfy the testing requirements.

3.30 Performance Test Report

The permittee shall submit a report of the results of any performance tests required by this permit including all required process data, to DEQ within 60 days after the date on which any required

compliance test is concluded, in accordance with IDAPA 58.01.01.157 and with the Performance Test General Provision.

Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Coeur D'Alene Regional Office  
2110 Ironwood Pkwy  
Coeur D'Alene, ID 83814  
Phone: (208) 769-1422  
Fax: (208) 769-1404

[1/16/15]

3.31 **40 CFR 63 Subpart JJJJJ**

In accordance with 40 CFR 63.11225(b) the permittee must prepare biennially, and submit upon request, a compliance certification report containing:

- The Company name and address, and
- A statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR 63 Subpart JJJJJ. Your notification must include the following certifications of compliance: this facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial tune-up of each boiler; and no secondary materials that are solid waste were combusted in any affected unit.

[1/16/15]

3.32 All requests, reports, applications, submittals, and other communications associated with 40 CFR 63, Subpart JJJJJ shall be submitted to:

Director Air and Waste  
US EPA  
1200 Sixth Avenue  
Seattle, WA 98101

and

Coeur d'Alene Regional Office  
Department of Environmental Quality  
2110 Ironwood Parkway  
Coeur d'Alene, ID 83814

[1/16/15]

**Incorporation of Federal Requirements by Reference**

3.33 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 (NESHAP), 40 CFR Part 63

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.

[1/16/15]

### 40 CFR 63 – General Provisions Applicability

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

General provisions cite	Subject	Does it apply?
§63.1	Applicability	Yes.
§63.2	Definitions	Yes. Additional terms defined in §63.11237.
§63.3	Units and Abbreviations	Yes.
§63.4	Prohibited Activities and Circumvention	Yes.
§63.9	Notification Requirements	Yes, excluding the information required in §63.9(h)(2)(i)(B), (D), (E) and (F). See §63.11225.
§63.10(a) and (b)(1)	Recordkeeping and Reporting Requirements	Yes.
§63.10(d)(1) and (2)	General reporting requirements	Yes.
§63.10(f)	Waiver of recordkeeping or reporting requirements	Yes.
§63.12	State Authority and Delegation	Yes.
§63.13-63.16	Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions	Yes.

[1/16/15]

## 4. KILNS - NO. 1, NO. 2, AND NO. 3

### 4.1 Process Description

The drying kilns are used to reduce the moisture content within the lumber. Steam from the boiler is used to provide the heat required by the kilns to extract the moisture from the lumber.

### 4.2 Emission Controls Description

Table 4 DRYING KILNS DESCRIPTION

Emissions Units / Processes	Emission Control Devices	Emission Points
Drying Kilns - No. 1, No 2, and No. 3	None	Multiple Stacks

### Emission Limits

#### 4.3 Emission Limits

The emissions from the combined drying kiln stacks shall not exceed any emissions rate limit in the following table.

Table 5 DRYING KILNS 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>
Drying Kilns combined	11.5	84.1

- In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- 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.
- Tons per any consecutive 12-calendar month period.

#### 4.4 Visible Emissions Limits

Visible emissions from the drying kilns shall comply with the Facility-wide Conditions for visible emissions of this permit.

### Operating Requirements

#### 4.5 Throughput Limits

The throughput of lumber for the drying kilns shall not exceed 144.126 million board feet during any consecutive 12-month period.

#### 4.6 Fugitive Emissions

Any fugitive emissions from the drying kilns operations shall comply with the Facility-wide Conditions for fugitive emissions of this permit.

### Monitoring and Recordkeeping Requirements

#### 4.7 Monitoring Requirements

Each month, the permittee shall monitor and record the throughput of lumber for the drying kilns in units of million board feet for that month and for the previous consecutive 12-month period. Annual throughput shall be determined by summing monthly throughput over the previous consecutive 12-month period. The monitoring and recording of the throughput of lumber shall determine compliance with permit conditions within the kiln section of this permit.

## 5. CYCLONES AND TARGET BOXES

### 5.1 Process Description

A pneumatic system is used to transport bark, chips, shavings and sawdust to 4 target boxes and 5 cyclones. There are several bins designed to store the wood waste byproduct to fill trucks with bark, shavings, or chips.

### 5.2 Emissions Control Description

Emissions from the target boxes and cyclones are uncontrolled, except for Bin 6 and Bin 8 exhaust. Bin 6 and Bin 8 shall have a control device added to the Bin's exhaust with a control efficiency of 90 percent or greater certified by the manufacturer of the control device(s).

### 5.3 Emission Controls Description

**Table 6 TARGET BOXES AND CYCLONES DESCRIPTION**

Emissions Units / Processes	Emission Control Devices	Emission Points
Target boxes and cyclones except Bin 6 and Bin 8 cyclones	None	Multiple Stacks
Bin 6 and Bin 8 cyclone exhaust	90% or better efficiency control device(s) as certified by the manufacturer	Exhaust stack(s) following control device(s)

## Emission Limits

### 5.4 Emission Limits

The emissions from the combined target boxes and cyclones multiple stacks shall not exceed the combined emissions rate limit in the following table.

**Table 7 TARGET BOXES AND CYCLONES EMISSION LIMITS<sup>a</sup>**

Source Description	PM <sub>10</sub> <sup>b</sup>
	T/yr <sup>c</sup>
Target boxes and cyclones combined	25.6

a) In absence of any other credible evidence, compliance is assured 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.

### 5.5 Visible Emissions Limits

Visible emissions from the target boxes or cyclones or air pollution control device(s) shall comply with the Facility-wide Conditions for visible emissions of this Permit.

## Operating Requirements

### 5.6 Operations and Maintenance Manual Requirements

Within 60 days of permit issuance, the permittee shall have developed and submitted to DEQ an Operations and Maintenance (O&M) manual for the target boxes and cyclones which describes the procedures that will be followed to comply with General Provisions of the permit and the manufacturer specifications. The manual shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The operation and monitoring requirements specified in the O&M manual are incorporated by reference to this permit and are enforceable permit conditions.

- 5.7 The permittee shall develop an O&M manual for the Bin 6 and Bin 8 air pollution control device according to manufacturer specifications and recommendations. This manual shall describe the methods and procedures that shall be followed to assure the air pollution control device is maintained in good working order and operated as efficiently as practical. The O&M manuals shall be updated as necessary and shall include, at a minimum, the most recent general descriptions of the equipment; the normal operating conditions and procedures for the equipment; startup, shutdown, and maintenance procedures; upset conditions guidelines; and corrective action procedures. The required installation of an air pollution control device will assist in the compliance of the emissions from Bins 6 and 8 with the modeling that determined compliance with National Ambient Air Quality Standards.

The O&M manuals developed for the Bin 6 and Bin 8 air pollution control device shall be submitted to DEQ within 60 days of the device installation for review and comment and shall contain a certification by a responsible official. Any changes to the O&M manuals shall be submitted to DEQ within 15 days of the change.

- 5.8 The exhaust emissions shall have an air pollution control device installed that will reduce emissions by at least 90 percent (90%) or better as certified by the air pollution control device manufacturer. The permittee shall follow procedures in General Provisions for notification of commencing this installation.

[1/3/13]

- 5.9 Any fugitive emission from the operations of the target boxes, cyclones or air pollution control device(s) shall comply with the Facility-wide Conditions for fugitive emissions of this permit.

### **Monitoring and Recordkeeping Requirements**

- 5.10 Target Boxes, Cyclones, and Air Pollution Control Device Visible Emissions Monitoring

Visible emissions monitoring of the target boxes or cyclones or air pollution control device(s) shall comply with the Facility-wide Conditions for visible emissions monitoring of this Permit

- 5.11 The monitoring and recording requirements of Permit Condition 38 shall determine compliance with Permit Conditions within the Target Boxes and Cyclones section of this permit.

## 6. GENERAL PROVISIONS

### General Compliance

6.1 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.

[Idaho Code §39-101, et seq.]

6.2 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]

6.3 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

6.4 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 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]

### Construction and Operation Notification

6.5 The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

## Performance Testing

- 6.6 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, at its option, may 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.
- 6.7 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.
- 6.8 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

## Monitoring and Recordkeeping

- 6.9 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information 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 and 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

- 6.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

## Certification

- 6.11 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**

6.12 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**

6.13 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**

6.14 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**

6.15 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]**