



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor  
Toni Hardesty, Director

November 19, 2007

**Certified Mail No. 7102 0243 6844 0000 0984**

Jim Warren  
Merritt Brothers Lumber Company  
P.O. Box 190  
Athol, ID 83801

RE: Facility ID No. 055-00039, Merritt Brothers Lumber Company, Athol  
Final Tier II Operating Permit and Permit to Construct

Dear Mr. Warren:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit and Permit to Construct (Tier II/PTC) No. T2-2007.0156 for Merritt Brothers Lumber Company, in accordance with the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400 - 441 and 58.01.01.200 - 228, respectively. This permit replaces Tier II/PTC No. T2-2007.0186, issued September 28, 2007.

The enclosed permit is effective immediately and is based on the information contained in your permit application. Modification to and/or renewal of this permit shall be requested in a timely manner in accordance with the Rules for the Control of Air Pollution in Idaho.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Ralph Paul, Coeur d'Alene Region Air Quality Compliance Officer, at (208) 769-4609 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends 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.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (Rules of Administrative Procedure Before the Board of Environmental Quality). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, prior to filing a petition for a contested case, DEQ encourages you to contact Shawnee Chen 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 "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS/SYC/hp Permit No. T2-2007.0156

Merritt Brothers Lumber Company  
November 19, 2007  
Page 2

c: Mark Boyle, Ralph Paul, Scott Honodel, Coeur d'Alene Regional Office  
Shawnee Chen, P.E., Senior Air Quality Engineer  
Bill Rogers, Permit Coordinator (Ltr Only)  
Marilyn Seymore/ Pat Rayne, Air Quality Division  
Laurie Kral, EPA Region 10  
Source File  
Permit Binder  
Phyllis Heitman (Ltr Only)  
Reading File (Ltr Only)



**Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT**

State of Idaho  
Department of Environmental Quality

**PERMIT No.:** T2-2007.0156  
**FACILITY ID No.:** 055-00039  
**AQCR:** 62                      **CLASS:** SM80  
**SIC:** 2421                      **ZONE:** 11  
**UTM COORDINATE (km):** 521.6, 5310.2

**1. PERMITTEE**  
Merritt Brothers Lumber Company – Remanufacturing Division

**2. PROJECT**  
Tier II Operating Permit Renewal

<b>3. MAILING ADDRESS</b> Post Office Box 190	<b>CITY</b> Athol	<b>STATE</b> ID	<b>ZIP</b> 83801
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<b>4. FACILITY CONTACT</b> Jim Warren	<b>TITLE</b> Mill Manager	<b>TELEPHONE</b> 208-683-3321
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<b>5. RESPONSIBLE OFFICIAL</b> Jim Warren	<b>TITLE</b> Mill Manager	<b>TELEPHONE</b> 208-683-3321
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<b>6. EXACT PLANT LOCATION</b> NE ¼ NW ¼ Section 16, Township 56 North, Range 3 West	<b>COUNTY</b> Kootenai
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**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Dimensional lumber manufacturing and remanufacturing

**8. PERMIT AUTHORITY**

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228 and IDAPA 58.01.01.400 through 470, respectively. This permit 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.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

The permit to construct conditions in 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 in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

SHAWNEE CHEN, P.E., PERMIT WRITER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

<b>DATE ISSUED:</b>	November 19, 2007
<b>DATE MODIFIED/REVISED:</b>	
<b>DATE EXPIRES:</b>	November 19, 2012

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## Acronyms, Units And Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
DEQ	Idaho Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutant
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
MACT	Maximum Available Control Technology
MBF	1,000 board feet
MMBF	million board feet
MMBF/yr	million board feet per year
MMBtu/hr	million British thermal units per hour
NO <sub>x</sub>	nitrogen oxides
OP	operating permit
OSU	Oregon State University
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter of 10 micrometers or less
PTC	Permit to Construct
SIC	Standard Industrial Classification Code
Tier II	Tier II Operating Permit
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0156**

**Permittee:** Merritt Brothers Lumber Company – Remanufacturing Division  
**Location:** Athol, Idaho

**Facility ID No.** 055-00039

**1. PERMIT SCOPE**

**Purpose**

- 1.1 This is a renewal to the facility’s Tier II Operating Permit (Tier II) and Permit to Construct (PTC). This Tier II renewal is required by IDAPA 58.01.01.405.03. [11/19/07]
- 1.2 This Tier II and PTC renewal replaces the following permits, the terms and conditions of which shall no longer apply:
- Tier II and PTC No. P-2007.0186, issued September 28, 2007, for establishing enforceable facility-wide limits for hazardous air pollutant (HAP) emissions to below the respective major source thresholds to avoid “plywood” and “boiler” MACT standards.
  - Tier II and PTC No. T2-040121, issued March 15, 2005, for the installation of the facility’s fifth lumber drying kiln.
  - Tier II and PTC No. P-040106, issued September 13, 2004, for the installation of the second natural gas-fired boiler, and the fourth lumber drying kiln at the facility.
  - Tier II and PTC No P-030103, issued February 6, 2004, for the increase of daily hours of operation from two eight-hour to two 10-hour shifts per day.
  - Tier II and PTC No. 055-00039, issued November 26, 2002, for the facility-wide permitting triggered by the construction of the natural gas-fired boiler, wood working equipment, and three lumber drying kilns at the facility without first obtaining a PTC.
  - PTC No. 005-50039, issued October 22, 1992, for the construction of a lumber remanufacturing facility. [11/19/07]

**Regulated Sources**

1.3 Table 1.1 below lists all sources of emissions that are regulated in this permit.

**Table 1.1 REGULATED EMISSION SOURCES**

Permit Section	Source Description	Emission Controls
2,3	Cleaver Brooks gas-fired boiler No.1, Model L-59569, 29.3 MMBtu/hr, manufactured in 11/74 and installed at the facility in 2/01. Cleaver Brooks gas-fired boiler No.2, Model CB200-350, 14.65 MMBtu/hr, manufactured in 4/73 and installed at the facility in 9/04.	None
2,4	Five dry kilns with an allowable throughput of 170 MMBF/yr	None
2,5	Cyclone and Baghouse No. 4 – Planer Mill	Baghouse
	Cyclone No. 5 – Finger-jointer cyclone – Finger-jointing Mill Cyclone No. 6 – Finger-jointer cyclone (pull through) – Finger-jointing Mill	None
2	Fugitive emissions sites (i.e. old planer chip bin truck loadout, planer shavings bin truck loadout, and plant road)	Reasonably control (Fugitive dust management plan)

[9/28/07]

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0156**

**Permittee:** Merritt Brothers Lumber Company – Remanufacturing Division  
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**Facility ID No.** 055-00039

***Permit Requirements Summary***

1.4 Table 1.2 below summarizes the action items required in this permit.

**Table 1.2 REPORTING, RECORDKEEPING, AND MONITORING SUMMARY**

<b>Requirement Description</b>	<b>Frequency</b>	<b>Permit Condition</b>
Fugitive complaint log	As needed	2.3
Visible emission inspections of cyclones/baghouse/truck bins	Every calendar quarter	2.5
Maintaining on-site records	Five years	2.6
Monitor throughput of all kilns	Monthly and 12-month summation	4.5, 4.6

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0156**

**Permittee:** Merritt Brothers Lumber Company – Remanufacturing Division  
**Location:** Athol, Idaho

**Facility ID No.** 055-00039

**2. FACILITY-WIDE CONDITIONS**

***Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent 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 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, where practical, of roadways and their maintenance in a clean condition.
  - Prompt removal, where practical, of earth or other stored material from streets.
- 2.2 The permittee shall comply with the fugitive dust management plan submitted to DEQ on January 15, 2003. Updated as necessary, the plan shall identify all sources at the facility that may emit fugitive dust, appropriate dust control methods for each source, and recordkeeping procedures for documenting the frequency and methods used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 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 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.

***Visible Emissions***

- 2.4 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 are the only reason(s) for the failure of the emission to comply with the requirements of this section.

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**Permittee:** Merritt Brothers Lumber Company – Remanufacturing Division  
**Location:** Athol, Idaho

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- 2.5 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential point source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance. 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.

***Sulfur Content***

- 2.6 The permittee shall not sell, distribute, use, or make available for use any 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.
  - ASTM Grades 4, 5, and 6 fuel oil – 1.75% by weight.
- 2.6.1 The permittee shall not sell, distribute, use, or make available for use any coal containing greater than 1% sulfur by weight.
- 2.6.2 The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as-received basis.

[11/19/07]

***Excess Emissions***

- 2.7 Reserved.

***Reports and Certifications***

- 2.8 Any reporting required by this permit, including but not limited to records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, 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. Any reporting required by this permit shall be submitted to:

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0156**

**Permittee:** Merritt Brothers Lumber Company – Remanufacturing Division  
**Location:** Athol, Idaho

**Facility ID No.** 055-00039

Air Quality Permit Compliance  
Department of Environmental Quality  
Coeur d’Alene Regional Office  
2110 Ironwood Parkway  
Coeur d’Alene, ID 83814

***Fuel-burning Equipment***

2.9 The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gaseous fuel.

***Open Burning***

2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-617, *Rules for Control of Open Burning*.

[11/19/07]

***Air Stagnation Advisory Days***

2.11 The permittee shall comply with the requirements of IDAPA 58.01.01.550 through 562, *Air Pollution Emergency Rule*.

***Obligation to Comply***

2.12 Receiving this permit shall not relieve the owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

***Facility-wide HAP Emissions Limits***

2.13 **Facility-wide HAP Emissions Limits**

2.13.1 Total facility-wide HAP emissions shall not exceed 24 T/yr based on a 12-month rolling average.

[9/28/07]

2.13.2 Any facility-wide individual HAP emissions shall not exceed 9 T/yr based on a 12-month rolling average.

[9/28/07]

***Facility-wide HAP Emissions Monitoring and Recordkeeping Requirements***

2.14 **Facility-wide HAP Emissions Monitoring and Recordkeeping**

2.14.1 The permittee shall calculate and record the total facility-wide HAP emissions and facility-wide individual HAP emissions monthly and annually to demonstrate compliance with Permit Condition 2.13.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0156**

<b>Permittee:</b>	Merritt Brothers Lumber Company – Remanufacturing Division	<b>Facility ID No.</b> 055-00039
<b>Location:</b>	Athol, Idaho	

- Monthly HAP emissions (tons) shall be determined by multiplying appropriate emission factors (lb/unit) by the recorded monthly operation/production rates (units/month) and dividing by 2000 lb/ton.
- Annual facility-wide HAP emissions shall be determined by calculating the HAP emissions for each month and adding the HAP emissions over the previous consecutive 11-month period.

2.14.2 The permittee shall monitor and record the wood species, the respective throughput, and the respective maximum kiln temperature monthly. The throughput for each species shall be recorded in million board feet per month (MMBF/month).

2.14.3 The permittee shall use emissions factors listed in Table 2.1 or DEQ-approved alternative emission factor(s) to estimate HAP emissions from lumber drying kilns.

**Table 2.1 Kiln Emissions Factors Based on OSU's Data**

Species	Max. Kiln Temp. °F	Total HAP lb/MMBF	Methanol lb/MMBF	Formaldehyde lb/MMBF	Acetaldehyde lb/MMBF	Propionaldehyde lb/MMBF	Acrolein lb/MMBF
Hemlock	< 200 °F	199	82	1.24	113	1	1.6
Hemlock	> 200 °F	305	186	3.8	113 <sup>(1)</sup>	1 <sup>(1)</sup>	1.6 <sup>(1)</sup>
Douglas Fir	< 200 °F	97	38	1	57	0.55	0.65
Douglas Fir	> 200 °F	116	57	1 <sup>(1)</sup>	57 <sup>(1)</sup>	0.55 <sup>(1)</sup>	0.65 <sup>(1)</sup>
White Fir	< 200 °F	240	122	2.8	113 <sup>(2)</sup>	1 <sup>(1)(2)</sup>	1.6 <sup>(1)(2)</sup>
White Fir	> 200 °F	301	183	2.8 <sup>(1)</sup>	113 <sup>(1)(2)</sup>	1 <sup>(1)(2)</sup>	1.6 <sup>(1)(2)</sup>
Ponderosa Pine <sup>(3)</sup>	< 200 °F	184	65	2.9	113 <sup>(1)(2)</sup>	1 <sup>(1)(2)</sup>	1.6 <sup>(1)(2)</sup>
Lodgepole Pine <sup>(3)</sup>	< 200 °F	73.6	55	4	12	1 <sup>(1)(2)</sup>	1.6 <sup>(1)(2)</sup>
Lodgepole Pine <sup>(3)</sup>	> 200 °F	78.6	60	4 <sup>(6)</sup>	12 <sup>(6)</sup>	1 <sup>(1)(2)</sup>	1.6 <sup>(1)(2)</sup>
Slash Pine <sup>(4)</sup>	> 200 °F	215	164	4 <sup>(5)</sup>	44.7	1 <sup>(1)(2)</sup>	1.6 <sup>(1)(2)</sup>

<sup>(1)</sup> Assumes emissions of this HAP not temperature dependent. There is insufficient data to know for sure.

<sup>(2)</sup> Assumes emissions are the same as hemlock

<sup>(3)</sup> Pine is not normally dried at temperatures > 200° F

<sup>(4)</sup> No data for Slash Pine dried < 200° F

<sup>(5)</sup> Assume to be the same as for Lodgepole Pine

<sup>(6)</sup> Assumes emissions the same as for Lodgepole Pine dried at < 200 ° F

**[9/28/07]**

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0156**

**Permittee:** Merritt Brothers Lumber Company – Remanufacturing Division  
**Location:** Athol, Idaho

**Facility ID No.** 055-00039

**3. NO. 1 AND NO. 2 NATURAL GAS-FIRED BOILERS**

**3.1 Process Description**

The Cleaver Brooks boilers generate steam heat for the dry kilns.

**3.2 Control Description**

Boiler emissions from the combustion of natural gas are uncontrolled.

***Emissions Limits***

**3.3 Emissions Limits**

PM<sub>10</sub> and VOC emissions from the boilers shall not exceed any corresponding emissions rate limits listed in Table 3.1.

**Table 3.1 BOILER EMISSIONS LIMITS**

Source Description	PM <sub>10</sub>	VOC
	lb/day	T/yr
Gas-Fired Boiler No.1	5.24	0.96
Gas-Fired Boiler No.2	2.62	0.48

***Operating Requirements***

**3.4 Boiler Fuel Specification**

To demonstrate compliance with Permit Condition 3.3, Boiler No. 1 and Boiler No.2 shall be fired on natural gas exclusively.

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**Location:** Athol, Idaho

**Facility ID No.** 055-00039

**4. DRY KILNS – FIVE TOTAL**

**4.1 Process Description**

The facility consists of five dry kilns used to dry green lumber. The dry kilns are heated using non-contact steam coils, with steam being supplied by Boiler No. 1 and Boiler No. 2. The dry kilns have five heat exchangers.

[11/19/07]

**4.2 Control Description**

Emissions from the dry kilns are uncontrolled.

***Emission Limits***

**4.3 Emission Limits**

- PM<sub>10</sub> emissions from the five dry kilns shall not exceed 90.72 lb/day.
- VOC emissions from the five dry kilns shall not exceed 96.46 T/yr, in any consecutive 12-month period.

***Operating Requirements***

**4.4 Maximum Facility Throughput**

- The maximum lumber throughput to the five dry kilns shall not exceed 24.75 MMBF/month, in any month.
- The maximum lumber throughput to the five dry kilns shall not exceed 170 MMBF/yr, in any consecutive 12-month period.

***Monitoring and Recordkeeping Requirements***

**4.5 Lumber Throughput**

The permittee shall monitor and record, monthly and annually, the lumber throughput and lumber species to the five dry kilns to demonstrate compliance with Permit Conditions 4.3 and 4.4. Throughput shall be recorded as million board feet (MMBF), or 1,000 board feet (MBF). Annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-month period.

[11/19/07]

**4.6 VOC Emissions Monitoring**

Using the information monitored and recorded in Permit Condition 4.5 and the species-specific VOC emission factor in Table 4.1, or DEQ-approved alternative emissions factors, the permittee shall calculate monthly and annually total VOC emissions as specified in the following to demonstrate compliance with Permit Condition 4.3. Annual emissions shall be determined by summing monthly

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0156**

<b>Permittee:</b>	Merritt Brothers Lumber Company – Remanufacturing Division	<b>Facility ID No.</b> 055-00039
<b>Location:</b>	Athol, Idaho	

emissions over the previous consecutive 12-month period. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

$$\text{Monthly Kiln VOC} = \sum_{i=1}^n (X_i \times Y_i) (\text{ton} / 2000\text{lbs})$$

Where:

- Monthly Kiln VOC = Kiln VOC Emissions of the month (tons/month)
- n = Number of types of wood dried
- X<sub>i</sub> = Throughput, in MMBF, of lumber of type i dried in all kilns of the month (MMBF/month)
- Y<sub>i</sub> = VOC emission factor for lumber of type i

**Table 4.1 VOC EMISSION FACTORS**

Type of wood dried	VOC (Y <sub>i</sub> , lb/MMBF)
Alder <sup>a</sup>	300
Douglas Fir <sup>b</sup>	560
Hemlock <sup>a</sup>	140
Lodgepole <sup>b</sup>	1230
Ponderosa <sup>b</sup>	1570
White fir <sup>b</sup>	300
Other <sup>c</sup>	1500

a. from Olympic Region Clean Air Agency (ORCAA), formally the Olympic Air Pollution Control Authority (OAPCA). OAPCA - DRY KILN FACTORS (4/8/99).

b. from OSU Small-scale Kiln Study, September 29, 2000.

c. DEQ data (1/8/97)

$$\text{Annual Kiln VOC Emissions} = \sum \text{previous 11 months, monthly VOC emissions in T/yr} + \text{this month VOC emissions in T/yr}$$

Where:

Annual kiln VOC emissions are based on a 12-month rolling average and calculated monthly.

**[9/28/07]**

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0156**

**Permittee:** Merritt Brothers Lumber Company – Remanufacturing Division  
**Location:** Athol, Idaho

**Facility ID No.** 055-00039

**5. PLANER MILL AND FINGER-JOINTING MILL**

**5.1 Process Description**

The facility contains several lumber processing areas, including a planer mill and a finger-jointing mill. Wood residuals (chips, shavings, and wood dust) generated from these process areas are pneumatically transferred to three cyclones where the wood residuals are separated from the air stream into two different truck bins.

**5.2 Control Description**

PM<sub>10</sub> emissions from planer mill cyclone No. 4 are controlled by the planer mill baghouse, which are connected in series. PM<sub>10</sub> emissions from finger-jointing mill cyclone No. 5 and finger-jointing mill cyclone No. 6 are uncontrolled.

***Emission Limits***

**5.3 Emission Limits**

PM<sub>10</sub> emissions from the planer mill cyclone No. 4 and planer mill baghouse, finger-jointing mill cyclone No. 5 and finger-jointing mill cyclone No. 6 shall not exceed corresponding emissions rate limits listed in Table 5.1.

**Table 5.1 BAGHOUSE AND CYCLONE EMISSIONS LIMITS**

Point Source Description	PM <sub>10</sub>
	lb/day
Planer mill cyclone, No.4 with baghouse	39.7
Finger-jointing mill cyclone, No.5	12.6
Finger-jointing mill cyclone (pull-through), No.6	12.6

***Operating Requirements***

**5.4 Planer Mill Baghouse Operating Requirements**

- 5.4.1 The baghouse that controls PM emissions from the planer mill cyclone No.4 shall be maintained in good working order and operate whenever the planer mill cyclone No.4 is operating.
- 5.4.2 The pressure drop across the planer mill baghouse inlet and the filter media shall be maintained within the specifications contained in the manufacturer's operating service manual. This manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.
- 5.4.3 The permittee shall monitor and record the pressure drop across the planer mill baghouse inlet and the filter media once per week. These records shall remain onsite for the most recent five-year period and shall be made available to DEQ representatives upon request.

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**Permittee:** Merritt Brothers Lumber Company – Remanufacturing Division  
**Location:** Athol, Idaho

**Facility ID No. 055-00039**

**6. SUMMARY OF EMISSION LIMITS**

**MERRITT BROTHERS LUMBER COMPANY – ATHOL**

**Table 6.1 EMISSION LIMITS – HOURLY (lb/hr) AND ANNUAL (T/Yr)**

Source Description	PM <sub>10</sub>	VOC	Each Facility-wide Individual HAP	Total Facility-wide HAPs
	lb/day	T/yr	T/yr	T/yr
Gas-fired Boiler No.1	5.24	0.96		
Gas-fired Boiler No.2	2.62	0.48		
Drying Kilns	90.72	96.46		
New Planer Cyclone, No.4 with Planer Mill Baghouse	39.7	NA		
Finger Jointer Cyclone, No.5	12.6	NA		
Finger Jointer Cyclone (pull-through), No.6	12.6	NA		
Facility-wide			9	24

Notes: Compliance determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

Compliance with annual limits determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

PM<sub>10</sub> limits include condensibles.

**[9/28/07]**

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0156**

**Permittee:** Merritt Brothers Lumber Company – Remanufacturing Division  
**Location:** Athol, Idaho

**Facility ID No.** 055-00039

**7. TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT GENERAL PROVISIONS**

***General Compliance***

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.]**

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, 405, 5/1/94]**

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, 406, 5/1/94]**

***Inspection and Entry***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- a. 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;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. 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***

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
- a. A notification of the date of initiation of construction, within five working days after occurrence;

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0156**

<b>Permittee:</b>	Merritt Brothers Lumber Company – Remanufacturing Division	<b>Facility ID No.</b> 055-00039
<b>Location:</b>	Athol, Idaho	

- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. 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;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. 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, 5/1/94]**

***Performance Testing***

- 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 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.

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.

Within 30 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***

- 7. 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, 405, 5/1/94]**

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT NO.: T2-2007.0156**

**Permittee:** Merritt Brothers Lumber Company – Remanufacturing Division  
**Location:** Athol, Idaho

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***Excess Emissions***

8. 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***

9. 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***

10. 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***

11. 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]

***Expiration and Renewal***

12. This permit shall be renewable on the expiration date, provided the permittee submits an application for renewal to the Department and continues to meet all terms and conditions contained in the permit. The expiration of this permit will not affect the operation of the stationary source or facility during the administrative procedure period associated with the permit renewal process.  
[IDAPA 58.01.01.209.04, 7/1/02]

***Transferability***

13. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06 and 404.05.  
[IDAPA 58.01.01.209.06, 404.05, 4/11/06]

***Severability***

13. 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, 5/1/94; 40 CFR 70.6(a)(5)]