



# Clean Air Act Full Compliance Evaluation Inspection Report

## ***PotlatchDeltic Land and Lumber, LLC – St. Maries Complex***

2200 Railroad Avenue  
St. Maries, ID 83861

Inspection Date: April 9, 2024

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Report Author Signature

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## Table of Contents

|                                                   |   |
|---------------------------------------------------|---|
| I. Basic Facility and Inspection Information..... | 3 |
| II. Purpose of Inspection.....                    | 4 |
| III. Compliance History.....                      | 5 |
| IV. Pre-Inspection Observations .....             | 5 |
| V. Facility and Process Description .....         | 5 |
| VI. Entry and Opening Conference .....            | 5 |
| VII. Facility Walk-Through.....                   | 6 |
| A. Plywood Mill .....                             | 6 |
| B. Planer Mill.....                               | 6 |
| C. Kilns.....                                     | 7 |
| D. Boilers .....                                  | 7 |
| VIII. Records Review and Closing Conference ..... | 7 |
| IX. Post Inspection Activities.....               | 8 |
| A. Records Review.....                            | 8 |
| B. Potential compliance concerns .....            | 8 |

## Attachments

|                   |                                 |
|-------------------|---------------------------------|
| Attachment 1..... | EPA Records Request             |
| Attachment 2..... | EPA Region 10 Digital Image Log |

## I. Basic Facility and Inspection Information

**Facility:** PotlatchDeltic Land and Lumber, LLC – St. Maries Complex  
2200 Railroad Avenue  
St. Maries, Idaho 83861

**Mailing Address:** 2200 Railroad Avenue  
St. Maries, ID 83861

**AFS/FRS Number:** 16-009-00001

**SIC:** 2421 Sawmills and Planing Mills, General  
2436 Softwood Veneer and Plywood

**NAICS:** 321113 Sawmills  
321212 Softwood Veneer and Plywood Manufacturing

**Permit Number:** R10PSD00103, dated March 18, 2021  
R10TNSR01803, dated October 14, 2021

**Facility Contacts:** Wes Green  
Environmental Manager  
PotlatchDeltic Corporation  
[wes.green@potlatchdeltic.com](mailto:wes.green@potlatchdeltic.com)

**U.S. EPA Inspectors:** Sara Conley  
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|                                                 |                                                                                                                                                                                                                                        |
|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                 | Boise, Idaho 83702<br>(206) 553-5748<br><a href="mailto:skeens.alyson@epa.gov">skeens.alyson@epa.gov</a>                                                                                                                               |
| <b>Coeur D’Alene<br/>Nation Representative:</b> | Brittany Nomee<br>Air Quality Specialist<br>Natural Resources<br>Coeur D’Alene Tribe<br>P.O. Box 408<br>Plummer, Idaho 83851<br>(208) 686-8101<br><a href="mailto:brittney.nomee@cdatribe-nsn.gov">brittney.nomee@cdatribe-nsn.gov</a> |
| <b>Date of Inspection:</b>                      | April 9, 2024                                                                                                                                                                                                                          |
| <b>Inspection Start/End Times:</b>              | 9:40 am – 14:35 pm                                                                                                                                                                                                                     |
| <b>Inspection Notice:</b>                       | This was an unannounced inspection.                                                                                                                                                                                                    |

## II. Purpose of Inspection

This was a Clean Air Act (CAA) compliance inspection by the Environmental Protection Agency (EPA). Inspector Conley led the inspection and Inspector Skeens participated. The inspection was coordinated with the Coeur d’Alene Tribe and Brittney Nomee participated in the inspection.

This was a full compliance evaluation by the U.S. Environmental Protection Agency Region 10. The purpose was to identify potential compliance concerns with CAA regulations, specifically the PSD and minor NSR permits; National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subparts DDDD, DDDDD, ZZZZ; and New Source Performance Standards Subpart IIII and JJJJ.

### **Disclaimer**

This report is a summary of observations and information gathered from the facility at the time of the inspection and from a subsequent records review. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

### **III. Compliance History**

Based on a review of the Detailed Facility Report in EPA's Enforcement and Compliance Online (ECHO) webpage, there were two formal and one informal enforcement actions in the last ten years.

- A State of Idaho Notice of Violation (NOV) was issued on 8/17/2018 and a state administrative order was issued on 10/5/2018 with a penalty of \$3,600.
- EPA Region 10 entered into an administrative Consent Agreement and Final Order (CAFO) on 8/17/2022 for failure to conduct annual CO testing under NESHAP DDDDD. PotlatchDeltic agreed to pay a penalty of \$84,547.

### **IV. Pre-Inspection Observations**

The inspectors went directly to the facility. No observations were made prior to the scheduled inspection.

The following records were reviewed prior to the inspection:

- Prevention of Significant Deterioration Permit to Construct, Revision No. 3, Permit No. R10PSD00103, Issued March 18, 2021;
- Minor New Source Review Permit, Revision No. 3, Permit No. R10TNSR01803, Issued October 14, 2021;
- Title V Air Quality Operating Permit, Initial Permit, Permit No. R10T5090000, pre-draft version;
- Statement of Basis for Title V Air Quality Operating Permit, Initial Permit, Permit No. R10T5090000, pre-draft version.

### **V. Facility and Process Description**

The following facility description is based on information provided by a facility representative in the opening conference as well as a written response by the facility to the records requests.

The Saint Maries Complex consists of a sawmill, two lumber dry kilns, planer mill and plywood mill. The facility processes raw logs into dimensional lumber and plywood by debarking, sawing, chipping, kiln drying, planning, lathing, veneer drying, veneer gluing, plywood pressing, and packaging for shipping. The facility has two biomass-fired boilers that produce steam to provide heat to the complex, including the kilns, veneer dryers, and plywood presses.

### **VI. Entry and Opening Conference**

Inspector Skeens, Brittney Nomee, and I arrived at 9:40 am on April 9, 2024. I presented my credentials to Wes Green, Environmental Manager; Bucky Shoemaker, Operations Manager; and Larry Branson, Manufacturing Manager and explained that we were at the facility to conduct a CAA inspection. I, Inspector Conley, initiated the opening conference and explained that the inspection would consist generally of a facility walkthrough and review of records followed by a closing conference. I explained that I planned to take photographs of equipment that emitted air pollution, as well as control devices, during the walkthrough. Before the facility walkthrough, I asked the facility representatives to describe the overall process at the facility. Mr. Green described the process generally but encouraged us to walk through the process and ask questions during and after the walkthrough. The opening conference concluded at approximately 10:00 am.

## **VII. Facility Walk-Through**

The inspection team was escorted by Wes Green during the facility walkthrough. The inspection included a thorough walkthrough of the facility and taking photographs/videos. The walkthrough began at approximately 10:00 am. A digital photo log is Attachment 2 to this report.

### **A. Plywood Mill**

The walkthrough began at the plywood mill. Prior to the plywood mill, logs are cut into 8 foot blocks and softened in vats of caustic. In the plywood mill, heated logs are debarked and shaved into veneers with a lathe (Photograph P4091614). The veneers are conveyed to the clipper to be cut to length and stacked for drying (Photographs P4091615 and P4091616). The facility has four veneer dryers which exhaust to a regenerative catalytic oxidizer (RCO). The boiler produces steam for the veneer dryers, the vats, kilns, and presses. The plywood presses use steam from the boiler to fuse the pieces with heat and pressure, adhesive is applied prior to the press. We walked through the adhesive lines. Adhesive is applied to the panels and defects are filled. Mr. Green explained that Potlatch checks the VOC content of the adhesives and walked us through the newer automated line which uses 60% less adhesive than the manual line. Both adhesive lines were in operation during the walkthrough. Emissions from the plywood presses are exhausted through vents in the roof.

### **B. Planer Mill**

We walked from the plywood mill to the planer mill. The planer mill is downstream from the lumber cutting and drying processes at the facility but is located near the plywood mill. Lumber is planed to the desired thickness in the planer mill. Dust from planed lumber, shavings, and chips are generated by various processes in the planer mill. Dust and shavings from processes in the planer mill exhaust are controlled by Baghouses 2 and 3 which route to the planer shavings

bin. Planer chips are conveyed to two chip bins for loading into trucks for sale. Sawmill chips are also loaded into chip bins for sale.

### **C. Kilns**

From the planer area we discussed the two, indirect-steam-heated kilns for drying lumber. Both kilns were in operation during the walkthrough and the inspection team did not observe their interiors. Kiln 5 and Kiln 6 are located at this facility. At the time of installation, Kiln 6 was subject to Minor New Source Review and is permitted by Region 10, Permit No. R10TNSR01803. PotlatchDeltic's nearby Lumber Drying Division (LDD) facility has four additional kilns. The LDD facility is not located on the Coeur d'Alene Reservation and is permitted separately.

Kiln 5 and 6 are dual tracked. The facility uses Windkiln software to control the drying process and for emissions calculations. Emissions from the kilns are not controlled by an add-on control device.

### **D. Boilers**

The facility has two biomass-fired boilers that generate steam to heat the complex's processes. The CE Boiler was installed in 1964. Particulate matter from the CE Boiler is controlled with a two-field electrostatic precipitator (ESP). The Riley Boiler was installed in 1966 and is equipped with a three-field ESP (Photo P4091618) to control particulate matter emissions. Facility personnel indicated the boilers only burn hog fuel and other wood waste from the St. Maries Complex. Fuel is fed to the boilers from the fuel bin (Photo P4091623). The roof of the fuel bin showed a buildup of material, which I mentioned to Mr. Green.

After we walked through the process, we stopped to observe the roof of the plywood mill. I asked about the various stacks on the roof and we discussed how emissions from the plywood mill are controlled. Mr. Green explained that fugitive emissions from the plywood mill are captured inside the building. There are uncontrolled roof vents over the cooling section of the plywood mill and the cooling section is not vented to the RCO. From the ground we could see the RCO, the building vents and the cooling section vents (Photos P4091622, P4091624-1627). Mr. Green also noted the plywood mill is cleaned daily. While observing the roof I noted some dust tracking on the road traveled by trucks coming in and out of the facility.

The walkthrough ended at 11:45 am.

## **VIII. Records Review and Closing Conference**

The inspection team returned to the facility at 12:58 pm and met with, Mr. Green, and Mr. Odekirk in the facility conference room to discuss records for review (see Attachment 1). Mr. Green and Mr. Odekirk answered questions from the inspectors. The inspection team discussed several of the aspects of facility's permit and regulatory requirements on April 9, including

questions about asbestos, kiln temperatures and compliance tracking, Method 22 on Kiln 6, the fugitive dust plan, boiler cleaning schedule and plywood mill cleaning schedule. We discussed how the facility is complying with the boiler requirements including monitoring oxygen and opacity. Facility personnel, including Mr. Green are notified via text message if there are errors in the boiler system or if there is missing data. A boiler operator is on-site 24 hours a day, seven days a week. Preventative maintenance forms are printed on a weekly basis and electronic records of preventative maintenance are kept for the dryers. We also discussed the internal combustion engines and requested engine maintenance records. Mr. Green also discussed the pneumatic conveyance system's maintenance schedule.

After the preliminary records review and discussion, I led the closing conference. The closing conference began at 13:47. The following facility representatives were present:

- Jacob Odekirk
- Larry Branson
- Allen Bucky Shoemaker
- Wes Green

I went through my inspection notes and described potential compliance concerns from the inspection. The following were identified as potential compliance concerns during the closing conference:

1. Dust on the road into the facility kicked up by truck traffic.
2. Dust build-up on and around the fuel bin.

Mr. Odekirk provided some feedback on the draft Title V permit related to sufficiency monitoring and testing the boiler at low load. As well as asked some questions about the regulations.

After our discussion, I explained that the inspection would not be complete until I have reviewed all the records that the facility submitted, reviewed my notes, and written an inspection report. Inspector Skeens, Ms. Nomee and I departed the facility at 14:30

## **IX. Post Inspection Activities**

### **A. Records Review**

The facility provided a response to our information request on April 30, 2024, and provided a supplement on June 6, 2024 with some updates and additional documentation on an emergency generator. Table 1 outlines the records received on April 30 and June 6, 2024.

### **B. Potential Compliance Concerns**

After reviewing the facilities responses, PSD and minor NSR permits; National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subparts DDDD, DDDDD, ZZZZ; and New Source Performance Standards Subpart JJJJ, I have the following potential compliance concerns:

1. Plywood Mill Dryer Door Seal Inspection Records do not clearly indicate that there were no issues found or no repairs needed to the dryer door seals after the inspections. The reports record the date the work was assigned, the status of the work (“in progress”), and the person responsible as well as a report with space to describe repairs made to the dryer door. The reports describing the repairs are blank. These records alone do not allow me to confirm that the inspection was performed and that no repairs were necessary.
2. The facility exceeded the NESHAP subpart DDDDD (Boiler MACT) Carbon Monoxide emissions limit at the Riley Boiler during the April 8, 2023, source test.
  - a. NESHAP subpart DDDDD Table 15, line 7 established a CO limit of 1,500 ppmvd @3% O<sub>2</sub> for stokers/sloped grate/others designed to burn wet biomass fuel boilers burning wet biomass fuel.
  - b. The CO emissions during the test were 1565 ppmvd @ 3% O<sub>2</sub> as the average of three runs.
  - c. In the test report dated June 5, 2023, PotlatchDeltic stated, “A water tube leak was found in the Riley boiler after the 4/8/2023 test. The leak was repaired and the Riley was retested for CO on 5/21/2023. Preliminary results indicate a three run CO average of approximately 465 ppmvd @ 3% O<sub>2</sub>.”
3. The stratification data for the April 8, 2023 Riley Boiler CO Run 2 indicates stratification was over 13%. The same data indicates only three traverse points were used instead of 12, required by Method 10 and 7E when stratification is plus or minus 10% of the mean.
  - a. EPA Method 10 Section 8.1 refers to EPA Method 7E Section 8.1 for Sampling Site and Sampling Points and Method 7E 8.1.2 Determination of Stratification states, “If the gas stream is found to be stratified because the 10.0 percent or 1.0 ppm criterion for a 3-point test is not met, locate twelve traverse points for the test in accordance with Table 1-1 or Table 1-2 of Method 1.”
4. The NESHAP subpart DDDDD April 8-9, 2023 stack test report for CO and PM emissions from the CE Boiler includes an EPA Method 1 Field Data sheet completed and signed on 4/15/22 with a handwritten note that says “verified, 4/9/23.” This stack test was conducted on 4/9/2023, nearly one year after the Method 1 Field Data sheet was completed.
  - a. Table 5 to Subpart DDDDD of Part 63, Title 40 Performance Testing Requirements states that you must select sampling ports location and the number of traverse points using, as appropriate, Method 1 at [40 CFR part 60, appendix A-1](#) of this chapter. Both line 1 and line 5 require Method 1.

5. The performance test report submitted on September 28, 2023 to demonstrate compliance with the National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products, 40 CFR Part 63, Subpart DDDD indicates that the stack testing may not have been performed consistent with Method 1. The PCWP MACT requires the facility conduct a performance test using the applicable method(s) specified in Table 4 to the subpart according to Line 7 of Table 7 of the PCWP MACT. Potlatch submitted a revised report on November 3, 2023, that stated, “In late October, after the original report was submitted, it was discovered that the stack dimensions were, both inlet and outlet, recorded incorrectly resulting in incorrect flow rates and mass rates. The pages 21-24, 50-51 and 53-59 of this report have been recalculated and revised. The ERT was also revised and resubmitted.” The stack test dimensions should be measured so the traverse points can be selected according to Method 1 as required in Table 4, Line 1 the PCWP MACT. The measurement procedure in Method 1 is described at 40 CFR Appendix-A-1-to-Part-60. Failure to conduct Method 1 could mean that the facility failed to properly place the measurement probe during performance testing.

*Table 1: Records Reviewed*

| Permit Condition                                                                                                                                                       | Requirement                                                                                                   | Records                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Air Permit No. R10NSR01802</b>                                                                                                                                      |                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4.1                                                                                                                                                                    | For LK-6 measure, calculate and record the following for each batch of lumber dried:<br><br>See 4.2.1 – 4.2.8 | Last month of records required by condition 4.2 for LK-6 for each batch of lumber dried: <ul style="list-style-type: none"> <li>• The species of wood dried;</li> <li>• The volume of lumber dried per batch (mbf/batch) and per year (mbf/yr);</li> <li>• The batch drying time per day (hr/day);</li> <li>• The entire batch drying time (hr/batch);</li> <li>• Equivalent volume of lumber dried per day (mbf/day);</li> <li>• The maximum set point temperature (°F) specified in the drying schedule;</li> <li>• The dry bulb temperature of the heated air that exits each load of lumber in each zone of the kiln (°F).</li> <li>• Moisture content (% dry basis) of a representative sample of boards (minimum of two courses) in each load of lumber.</li> </ul> |
| <p><i>Response:</i> In the supplemental response Potlatch provided the requested kiln records. Maximum temperature, 60-min ave, ranged from 239F to 251F at inlet.</p> |                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4.3                                                                                                                                                                    | For PB-1 and PB-2 measure, calculate and record the following for each boiler:                                | Last month of records required by condition 4.3 for PB-1 and PB-2: <ul style="list-style-type: none"> <li>• Steam production recorded hourly, daily and annually (mlb steam/hr, mlb steam/day and mlb steam/yr);</li> <li>• Oxygen downstream of the combustion chamber as an hourly (%);</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                         |                                                                                                                                                                                                                                                                                                                                                                                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                         | <ul style="list-style-type: none"> <li>Pressure drop across the multiclone hourly (inches of water); Secondary voltage and current hourly for each field of the ESP (kilovolts and milliamps, respectively); Hourly sparking rate for each field of the ESP; Hourly secondary power hourly for each field of the ESP (kilowatts).</li> </ul>                                             |
| <p><i>Response:</i> Potlatch provided the requested records. There are instances in the hourly record when the opacity is above 10% for the CE Boiler and the Riley Boiler, the records do not indicate if these instances occur during an SSM event or during normal operation. Records of secondary voltage, secondary current, sparking rate, and secondary power were provided for the CE and Riley boilers. Steam production and multiclone pressure drop records were provided.</p> |                         |                                                                                                                                                                                                                                                                                                                                                                                          |
| 4.4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Planer mill and sawmill | <p>Last month of the following records required by condition 4.5 for the planer and sawmill:</p> <ul style="list-style-type: none"> <li>Planer mill operating hours, daily and annually (hr/day and hr/yr);</li> <li>Daily BH-4 fan operating hours (hr/day);</li> <li>Daily sawmill operating hours (hr/day); and Daily measurement of lumber entering the planer (mbf/day).</li> </ul> |
| <p><i>Response:</i> Daily records of operating hours provided along with lumber input per day. Baghouse 4 operating at all times lumber input was recorded for the planer.</p>                                                                                                                                                                                                                                                                                                            |                         |                                                                                                                                                                                                                                                                                                                                                                                          |
| 4.5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | PT                      | <p>One month of records required by condition 4.6:</p> <ul style="list-style-type: none"> <li>The frequency of water applications to paved and unpaved areas (#/day-area).</li> <li>The frequency of chemical applications to paved and unpaved areas (#/day-area) and identity of the chemical agent.</li> <li>The frequency of trips (#/day-area) to sweep paved areas.</li> </ul>     |

|                                                                                                                                                             |                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Response:</i> All requested records were provided.                                                                                                       |                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4.6                                                                                                                                                         | Daily PM 2.5 emission records                         | One month of weekly calculations of daily PM2.5 emissions (lb/day) for the emission units listed in, Condition 3.8.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <i>Response:</i> Potlatch provided all requested records for March 2024. Units included Sawmill, planer mill, baghouse 4, CE and Riley Boilers, and Kiln 6. |                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4.9 and 4.14                                                                                                                                                | Fugitive dust or visible particulate emissions survey | <ul style="list-style-type: none"> <li>• Details of each visual survey, including date, time, observer and results for each emission unit and any other pollutant emitting activity; Date, time and type of any investigation conducted pursuant to Condition 4.12.1;</li> <li>• Findings of the investigation, including the reasons for the presence of visible emissions or fugitive emissions of particulate matter;</li> <li>• Date, time and type of corrective actions taken pursuant to Condition 4.12.2;</li> <li>• Field, observation and data reduction records for any Reference Method 9 determination conducted on the source of visible or fugitive emissions pursuant to Condition 4.13;</li> <li>• A list identifying the emission units and pollutant emitting activities that the Permittee identifies as potential sources of fugitive dust or visible particulate emissions;</li> <li>• A list identifying the emission units and pollutant emitting activities that qualify for, and for which the Permittee has elected to conduct, quarterly monitoring in accordance with Condition 4.11.</li> </ul> |

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|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| <i>Response:</i> Monthly FD/VE Survey provided for observations on 3/28/2024, no emission were observed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                   |                                                                                                                                         |
| 4.16                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Annual Fugitive Dust Survey                                                                                                                                                                       | Results of the annual fugitive dust survey.                                                                                             |
| <i>Response:</i> Survey from 8/23/2023 was included. No fugitive emissions recorded.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                   |                                                                                                                                         |
| <b>Air Permit No. R10PSD00103</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                   |                                                                                                                                         |
| 4.2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | The dry bulb temperature and lumber moisture content measurement systems required in Condition 4.1 shall be calibrated at least every six months using the manufacturer's recommended procedures. | Copy of the calibration records for the dry bulb temperature and lumber moisture content measurement systems required in Condition 4.1. |
| <i>Response:</i> Provided records of thermocouple calibration or replacement. Also included the QA/QC plan for Kiln 6 moisture content.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                   |                                                                                                                                         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Kiln 6 PSD and Minor NSR Semi-Annual Report                                                                                                                                                       |                                                                                                                                         |
| <i>Response:</i> 2023 Annual Report dated Feb 14, 2024. Report included deviation reports for the Riley Boiler ESP and no deviations of the PSD permit conditions. 2023 Semi-Annual report for Kiln 6 dated August 22, 2023, covers January 1, 2023 – June 30, 2023. Data acquisition system signal issues reported as deviations. Deviation reports are included.                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                   |                                                                                                                                         |
| NESHAP DDDDD (Boiler MACT)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                   |                                                                                                                                         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | CE & Riley Boiler tune-up records for 2022 to present                                                                                                                                             |                                                                                                                                         |
| <i>Response:</i> April 8, 2022 CE and Riley Boiler: Tune boiler for low steam.<br><br>May 2022 CE Boiler: Tube leak is noted as causing draft problem, report contains 5 recommendations to improve steam supply. CO is found to be within permit limits (CO 1118 ppm raw, NOx 45.6 ppm raw)<br><br>March 24, 2023 Riley Boiler: Report recommends update to control system. Leaking boiler tubes found, repair recommended. CO 2359 ppm @3% O2 before adjustment and 896.4 ppm @3% O2 after adjustment.<br><br>April 28, 2023 CE Boiler: Same 5 recommendations for increasing steam supply, CO found to be within permit limits (CO 185.8 ppm raw, NOx 66.0 ppm raw) |                                                                                                                                                                                                   |                                                                                                                                         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | CE & Riley Boiler Source Test Report                                                                                                                                                              |                                                                                                                                         |

|                                                                                                                                                                                                                                                                                                 |                                                               |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|--|
| <i>Response:</i> Riley Boiler April 8, 2023 PM pass, CO 1565 ppmvd @3% O2, limit is 1500 ppmvd @ 3% O2. Steaming rate ~45,000 lb/hr                                                                                                                                                             |                                                               |  |
| CE Boiler April 9, 2023 CO, 76.1% of 1100 ppmvd @ 3% O2 limit. Steaming rate ~10,000 lb/hr                                                                                                                                                                                                      |                                                               |  |
|                                                                                                                                                                                                                                                                                                 | CE Boiler 2023 hourly opacity and oxygen data                 |  |
|                                                                                                                                                                                                                                                                                                 | Riley Boiler 2023 hourly opacity and oxygen data              |  |
| <i>Response:</i> Records included, reviewed above (4.3).                                                                                                                                                                                                                                        |                                                               |  |
|                                                                                                                                                                                                                                                                                                 | CE & Riley Boiler steam generating rate for 2023              |  |
|                                                                                                                                                                                                                                                                                                 | CE & Riley Boiler hourly ESP secondary voltage data 2022-2023 |  |
| <i>Response:</i> Records received, reviewed above (4.3)                                                                                                                                                                                                                                         |                                                               |  |
|                                                                                                                                                                                                                                                                                                 | Site specific monitoring plan for Oxygen and Steam CMS        |  |
| <i>Response:</i> Revision 2, dated April 2023.                                                                                                                                                                                                                                                  |                                                               |  |
| NESHAP DDDD (PCWP MACT)                                                                                                                                                                                                                                                                         |                                                               |  |
|                                                                                                                                                                                                                                                                                                 | Last 2 RCO Catalyst Testing Reports                           |  |
| <i>Response:</i> Reports included in response. Corrective action report describes May 5 <sup>th</sup> , 2023 “bakeout” of RCO. July 2022 Report included, recommended no change to operating temperature. March 2023, recommended increasing the operating temperature and recommended bakeout. |                                                               |  |
|                                                                                                                                                                                                                                                                                                 | RCO 3-hr block temperature values for last 2 years            |  |
| <i>Response:</i> Records provided.                                                                                                                                                                                                                                                              |                                                               |  |
|                                                                                                                                                                                                                                                                                                 | Work Practices Plan                                           |  |
| <i>Response:</i> Record provided.                                                                                                                                                                                                                                                               |                                                               |  |
|                                                                                                                                                                                                                                                                                                 | CMS quality control procedures                                |  |
| <i>Response:</i> Thermocouple replacement documentation, 180 day frequency, for RCO provided.                                                                                                                                                                                                   |                                                               |  |

|                                                                                                                                                 |                                                                           |                                                                                                |
|-------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|
|                                                                                                                                                 | NESHAP DDDD (PCWP MACT) Semi-Annual Reports for 1 <sup>st</sup> half 2023 | <i>Response:</i> Spreadsheet for CEDRI upload CMS deviations included.                         |
|                                                                                                                                                 | NESHAP DDDD (PCWP MACT) Semi-Annual Reports for 2 <sup>nd</sup> half 2023 | <i>Response:</i> Required records included, no deviations reported.                            |
|                                                                                                                                                 | NESHAP DDDD (PCWP MACT) Semi-Annual Reports for 2nd half 2022             | <i>Response:</i> Spreadsheet for CEDRI upload, RCO temperature monitoring deviations reported. |
|                                                                                                                                                 | Records of the HAP content of coatings                                    |                                                                                                |
| <i>Response:</i> Records provided.                                                                                                              |                                                                           |                                                                                                |
| Engine Records NSPS IIII                                                                                                                        |                                                                           |                                                                                                |
| <i>Response:</i> Maintenance records provided along with hours for Engines 1 and 2 provided (NSPS IIII) and Engines 3 through 11 (NESHAP JJJJ). |                                                                           |                                                                                                |

## RECORDS REQUEST

### EPA Clean Air Act, Full Compliance Evaluation (FCE)

#### PotlatchDeltic Land and Lumber, LLC – St. Maries Complex

Coeur d’Alene Reservation

2200 Railroad Avenue

St. Maries, Idaho

Air Permit No. R10NSR01802 and Air Permit No. R10PSD00103

Please provide the following records. I can set up a file sharing link for electronic records:

| Permit Condition                  | Requirement                                                                                               | Records                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Air Permit No. R10NSR01802</b> |                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4.2                               | For LK-6 measure, calculate and record the following for each batch of lumber dried:<br>See 4.2.1 – 4.2.8 | Last month of records required by condition 4.2 for LK-6 for each batch of lumber dried: <ul style="list-style-type: none"> <li>• The species of wood dried;</li> <li>• The volume of lumber dried per batch (mbf/batch) and per year (mbf/yr);</li> <li>• The batch drying time per day (hr/day);</li> <li>• The entire batch drying time (hr/batch);</li> <li>• Equivalent volume of lumber dried per day (mbf/day);</li> <li>• The maximum set point temperature (°F) specified in the drying schedule;</li> <li>• The dry bulb temperature of the heated air that exits each load of lumber in each zone of the kiln (°F).</li> <li>• Moisture content (% dry basis) of a representative sample of boards (minimum of two courses) in each load of lumber.</li> </ul> |
| 4.4                               | For PB-1 and PB-2 measure, calculate and record the following for each boiler:                            | Last month of records required by condition 4.4 for PB-1 and PB-2: <ul style="list-style-type: none"> <li>• Steam production recorded hourly, daily and annually (mlb steam/hr, mlb steam/day and mlb steam/yr);</li> <li>• Oxygen downstream of the combustion chamber as an hourly (%);</li> <li>• Pressure drop across the multiclone hourly (inches of water); Secondary voltage and current hourly for each field of the ESP (kilovolts and milliamps, respectively); Hourly sparking rate for each field of the ESP; Hourly secondary power hourly for each field of the ESP (kilowatts).</li> </ul>                                                                                                                                                                |
| 4.5                               | Planer mill and sawmill                                                                                   | Last month of the following records required by condition 4.5 for the planer and sawmill:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

## RECORDS REQUEST

### EPA Clean Air Act, Full Compliance Evaluation (FCE)

|               |                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|-------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|               |                                                       | <ul style="list-style-type: none"> <li>• Planer mill operating hours, daily and annually (hr/day and hr/yr);</li> <li>• Daily BH-4 fan operating hours (hr/day);</li> <li>• Daily sawmill operating hours (hr/day); and</li> <li>• Daily measurement of lumber entering the planer (mbf/day).</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 4.6           | PT                                                    | <p>One month of records required by condition 4.6:</p> <ul style="list-style-type: none"> <li>• The frequency of water applications to paved and unpaved areas (#/day-area).</li> <li>• The frequency of chemical applications to paved and unpaved areas (#/day-area) and identity of the chemical agent.</li> <li>• The frequency of trips (#/day-area) to sweep paved areas.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 4.7           | Daily PM 2.5 emission records                         | One month of weekly calculations of daily PM2.5 emissions (lb/day) for the emission units listed in, Condition 3.8.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 4.12 and 4.13 | Fugitive dust or visible particulate emissions survey | <ul style="list-style-type: none"> <li>• Details of each visual survey, including date, time, observer and results for each emission unit and any other pollutant emitting activity; Date, time and type of any investigation conducted pursuant to Condition 4.12.1;</li> <li>• Findings of the investigation, including the reasons for the presence of visible emissions or fugitive emissions of particulate matter;</li> <li>• Date, time and type of corrective actions taken pursuant to Condition 4.12.2;</li> <li>• Field, observation and data reduction records for any Reference Method 9 determination conducted on the source of visible or fugitive emissions pursuant to Condition 4.13;</li> <li>• A list identifying the emission units and pollutant emitting activities that the Permittee identifies as potential sources of fugitive dust or visible particulate emissions;</li> <li>• A list identifying the emission units and pollutant emitting activities that qualify for, and for which the Permittee has elected to conduct, quarterly monitoring in accordance with Condition 4.11.</li> </ul> |

## RECORDS REQUEST

### EPA Clean Air Act, Full Compliance Evaluation (FCE)

|                            |                                                                                                                                                                                                   |                                                                                                                                         |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
| 4.17                       | Annual Fugitive Dust Survey                                                                                                                                                                       | Results of the annual fugitive dust survey.                                                                                             |
| Air Permit No. R10PSD00103 |                                                                                                                                                                                                   |                                                                                                                                         |
| 4.2                        | The dry bulb temperature and lumber moisture content measurement systems required in Condition 4.1 shall be calibrated at least every six months using the manufacturer’s recommended procedures. | Copy of the calibration records for the dry bulb temperature and lumber moisture content measurement systems required in Condition 4.1. |
|                            | Kiln 6 PSD and Minor NSR Semi-Annual Report                                                                                                                                                       |                                                                                                                                         |
|                            | Kiln 6 2022 PSD and Minor NSR Annual Report                                                                                                                                                       |                                                                                                                                         |
| NESHAP DDDDD (Boiler MACT) |                                                                                                                                                                                                   |                                                                                                                                         |
|                            | CE & Riley Boiler tune-up records for 2022 to present                                                                                                                                             |                                                                                                                                         |
|                            | CE & Riley Boiler Source Test Report                                                                                                                                                              |                                                                                                                                         |
|                            | CE Boiler 2023 hourly opacity and oxygen data                                                                                                                                                     |                                                                                                                                         |
|                            | Riley Boiler 2023 hourly opacity and oxygen data                                                                                                                                                  |                                                                                                                                         |
|                            | CE & Riley Boiler steam generating rate for 2023                                                                                                                                                  |                                                                                                                                         |
|                            | CE & Riley Boiler hourly ESP secondary voltage data 2022-2023                                                                                                                                     |                                                                                                                                         |
|                            | Site specific monitoring plan for Oxygen and Steam CMS                                                                                                                                            |                                                                                                                                         |
| NESHAP DDDD (PCWP MACT)    |                                                                                                                                                                                                   |                                                                                                                                         |
|                            | Last 2 RCO Catalyst Testing Reports                                                                                                                                                               |                                                                                                                                         |
|                            | RCO 3-hr block temperature values for last 2 years                                                                                                                                                |                                                                                                                                         |
|                            | Work Practices Plan                                                                                                                                                                               |                                                                                                                                         |
|                            | CMS quality control procedures                                                                                                                                                                    |                                                                                                                                         |
|                            | NESHAP DDDD (PCWP MACT) Semi-Annual Reports for 1 <sup>st</sup> half 2023                                                                                                                         |                                                                                                                                         |
|                            | NESHAP DDDD (PCWP MACT) Semi-Annual Reports for 2 <sup>nd</sup> half 2023                                                                                                                         |                                                                                                                                         |
|                            | NESHAP DDDD (PCWP MACT) Semi-Annual Reports for 2nd half 2022                                                                                                                                     |                                                                                                                                         |
|                            | Records of the HAP content of coatings                                                                                                                                                            |                                                                                                                                         |

United States Environmental Protection Agency  
Region 10 – Seattle, WA

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