



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 155  
Seattle, WA 98101-3188

AIR & RADIATION  
DIVISION

Mr. Steve Henson, Plant Manager  
PotlatchDeltic Land and Lumber, LLC  
St. Maries Complex  
2200 Railroad Avenue  
St. Maries, Idaho 83861

Dear Mr. Henson:

This letter responds to PotlatchDeltic's request for administrative amendments to the final Prevention of Significant Deterioration permit and the final tribal minor New Source Review permit issued by the U.S. Environmental Protection Agency to PotlatchDeltic on June 21, 2019, for the construction and operation of the Kiln #6 project in Saint Maries, Idaho. PotlatchDeltic's request was submitted by email to Region 10 Administrator, Chris Hladick, on October 1, 2019, and revised by a subsequent email to Regional Administrator Hladick on October 2, 2019. PotlatchDeltic requested technical corrections to the moisture content monitoring conditions in both permits to reflect the number and location of the Wellons true capacitance moisture meters, and the sampling frequency and calculations performed by the computerized multizone control system required by the permits. After staff level discussions over the last week, we have revised the moisture content monitoring conditions in both permits to address PotlatchDeltic's requested changes.

Both permits include a work practice standard designed to prevent the excess VOC and PM2.5 emissions that would result from over-drying a batch of lumber. It is the EPA's intention to rely on the data generated by the Wellons true capacitance moisture meters and computerized multizone control system to demonstrate whether any batch of lumber was dried to moisture contents less than the lowest product specification for the species dried in this new kiln (specifically, 13 percent moisture content on a dry basis). The current permit conditions do not correctly address the number and location of moisture sensors for partial loads and specify an incorrect sampling frequency. PotlatchDeltic erroneously told the EPA that the sampling frequency was every 60 seconds when in fact it is every 6 minutes. In addition, the current permit conditions do not specify what moisture content data to use for compliance purposes in the situation where a batch of lumber undergoes equalization and conditioning after the drying cycle is complete.

Because these technical corrections are de minimis in nature and are being made to align the permit language with the moisture content monitoring and calculations that the purchased kiln control system is performing, and do not alter our prior BACT or control technology analyses, we are processing the corrections that PotlatchDeltic requested as administrative amendments to the permits, effective immediately. Enclosed find the addenda to the original permits, issued today.

If you have any questions, please contact Kelly McFadden, Chief, Air Permits and Toxics Branch, at (206) 553-1679 or [mcfadden.kelly@epa.gov](mailto:mcfadden.kelly@epa.gov).

Sincerely,

/s/ David Bray for 10/10/2019

Krishna Viswanathan  
Acting Director

#### Enclosures

1. Revision No. 1 to PSD Permit No. R10PSD00100
2. Revision No. 1 to Tribal Minor NSR Permit No. R10TNSR01800