



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Tier I Operating Permit No. T1-2008.0183

Final

**Clearwater Paper Corporation
Wood Products Division, Idaho**

Lewiston, Idaho

Facility ID No. 069-00003

December 23, 2008

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Permit Coordinator

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions including references to the applicable statutory or regulatory provisions for the terms and conditions as required by IDAPA 58.01.01.362

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Acronyms, Units and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
gr	grain (1 lb = 7,000 grains)
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HAPs	Hazardous Air Pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
Tier I	Tier I operating permit
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

TIER I OPERATING PERMIT STATEMENT OF BASIS

Permittee:	Clearwater Paper Corp. – Wood Products Division	Permit No.	T1-2008.0183
Location:	Lewiston, Idaho	Facility ID No.	069-00003

INTRODUCTION AND APPLICABILITY

Clearwater Paper Corporation – Wood Products Division, Idaho is a manufacturer of dimensional kiln-dried lumber and trim board products, and is located at 807 Mill Road, Lewiston, Idaho 83501. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit VOCs above the major source threshold of 100 tons-per-year. The facility is also classified as a major facility, as defined by Subsection 008.10.a, because it emits or has the potential to emit methanol above the major source thresholds of 10 tons-per-year for any single HAP. As a major facility, Clearwater Paper Corporation – Wood Products Division, Idaho is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from Clearwater Paper Corporation – Wood Products Division, Idaho as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for Clearwater Paper Corporation – Wood Products Division, Idaho.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

Clearwater Paper Corporation – Wood Products Division, Idaho Tier I operating permit is organized into sections. They are as follows:

Section 1 – Application Scope and Application Chronology

The scope describes this permitting action and the chronology lists the events associated with the application.

Section 2 – Facility Information

Describes the facility and provides the permitting history of the facility.

Link to T1-2007.0095 SOB

For information regarding the regulated sources, emissions inventory, etc. for this facility, go to www.deq.idaho.gov and review the statement of basis for T1-2007.0095, issued January 23, 2008.

TIER I OPERATING PERMIT STATEMENT OF BASIS

Permittee:	Clearwater Paper Corp. – Wood Products Division	Permit No.	T1-2008.0183
Location:	Lewiston, Idaho	Facility ID No.	069-00003

1. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

1.1 Application Scope

This permit is an administrative amendment of the facility's currently effective Tier I operating permit. Specifically, the applicant requests that the facility name be changed from Potlatch Forest Products Corp., Lewiston Wood Products to Clearwater Paper Corporation – Wood Products Division, Idaho. In addition, the applicant requests that the Responsible Official be changed from Marc Mendenhall to Dana Schmitz. No other changes to the existing permit were requested.

1.2 Application Chronology

- November 14, 2008 DEQ received a permit application to administratively change the name of the facility and replace the Responsible Official as described above in the Application Scope.
- December 23, 2008 DEQ issued Administrative Amendment T1-2008.0183 for the name change.

2. FACILITY INFORMATION

2.1 Facility Description

This facility is a dimension lumber mill.

2.2 Facility Permitting History

2.2.1 Tier I Operating Permit History – Previous 5-year permit term December 10, 2002 to December 15, 2008

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from December 10, 2002 to December 15, 2008. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

- December 10, 2002 Permit No. 069-00003, Initial T1, Permit status (S)
- July 18, 2003 T1-030203, Administrative Amendment – Initial T1 included five (5) fire pump engine. The facility has only four (4). This action removed one (1) fire pump engine from the permit. (S)
- August 16, 2006 T1-060206, Administrative Amendment – Facility name change. Potlatch Corporation to Potlatch Forest Products Corporation. (S)
- January 23, 2008 T1-2007.0095, T1 renewal (S)
- December 23, 2008 T1-2008.0183, Administrative Amendment – Facility name change. Potlatch Forest Products Corp., Lewiston Wood Products to Clearwater Paper Corporation – Wood Products Division, Idaho. (A)

TIER I OPERATING PERMIT STATEMENT OF BASIS

Permittee:	Clearwater Paper Corp. – Wood Products Division	Permit No.	T1-2008.0183
Location:	Lewiston, Idaho	Facility ID No.	069-00003

2.2.2 Underlying Permit History – Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

August 22, 1984	Operating Permit No. 1140-00001 (A)
August 16, 2005	PTC No. P-050200, Lumber drying kiln replacement project. PTC to construct four new lumber drying kilns to replace 32 existing lumber drying kilns. Increase annual lumber drying capacity from 237.6 MMbf/yr to 351.0 MMbf/yr. (A)
October 17, 2006	PTC No. P-060205, Fuel Hog transfer of ownership. The Fuel Hog was formerly owned and operated by Potlatch Forest Products Corp., IPPD. It was purchased by Potlatch Forest Product Corp., Lewiston Wood Products and relocated to that facility (069-00001 to 069-00003). (A)

3. **EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY**

There were no physical or operational changes to the facility as part of this permit amendment. For information about the emissions units, processes and emissions inventory, please refer to the Statement of Basis for the Tier I Operating Permit issued on January 23, 2008.

4. **EMISSIONS LIMITS AND MRRR**

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement (e.g., emissions limit or operating requirement) and state how compliance with the applicable requirement is to be demonstrated. There was no change to the facility or any MRRR in the permits as part of this permit amendment. For additional information regarding emissions limits and MRRR, refer to the Statement of Basis for the Tier I Operating Permit issued on January 23, 2008.

5. **REGULATORY REVIEW**

Aside from referring to the facility by its new name in the Summary Description of Section 3, there were no changes to the permit conditions for this facility as part of this permit amendment; therefore, the existing requirements in the Tier I permit remains in effect and unchanged. For details about permit requirements, refer to the Statement of Basis for the Tier I Operating Permit issued on January 23, 2008.

5.1 **Tier I Administrative Amendment (IDAPA 58.01.01.381)**

The new Tier I permit is a Tier I “Administrative Amendment” of the facility’s existing Tier I permit per IDAPA 58.01.01.381. In accordance with this rule, notice to the public or affected States is not required, and a copy of the revised permit will be submitted to the EPA in addition to sending the original copy sent to Potlatch.

TIER I OPERATING PERMIT STATEMENT OF BASIS

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6. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.381.02.c and 404.04, a notice to the public or affected states is not required and was not issued for this permit action.

7. EPA REVIEW OF PROPOSED PERMIT

Pursuant to Section 381.02.c DEQ is required to proceed with final action on the administrative amendment request. Submittal of a proposed permit to EPA for review is not a requirement for an administrative amendment, and for this reason a proposed permit was not sent to EPA. A copy of the final permit will be sent to EPA Region 10.