



State of Idaho  
Department of Environmental Quality  
Air Quality Division

**AIR QUALITY PERMIT  
STATEMENT OF BASIS**

**Tier I No. T1-2008.0203**

**Final**

**Idaho Forest Group LLC**

**Grangeville Facility**

**Grangeville, Idaho**

**Facility ID No. 049-00003**

**February 17, 2009**

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The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I 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

AIRS	Aerometric Information Retrieval System
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U. S. Environmental Protection Agency
HAP	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NO <sub>x</sub>	nitrogen oxides
PTC	permit to construct
SO <sub>2</sub>	sulfur dioxide
Tier I	Tier I operating permit
VOC	volatile organic compound

## TIER I OPERATING PERMIT STATEMENT OF BASIS

<b>Permittee:</b>	Idaho Forest Group LLC	<b>Permit No.</b>	T1-2008.0203
<b>Location:</b>	Grangeville, Idaho	<b>Facility ID No.</b>	049-00003

### 1. INTRODUCTION AND APPLICABILITY

Idaho Forest Group LLC produces dimensional lumber products at the Grangeville facility and is located at Highway 95, milepost 240.8, Grangeville. 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 NO<sub>x</sub>, SO<sub>2</sub>, CO, and VOC above the major source threshold of 100 tons per year. At the time of this permitting action, the facility is not a major source of HAP emissions. As a major facility, Idaho Forest Group LLC, Grangeville facility 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 Idaho Forest Group LLC 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 terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I for Idaho Forest Group LLC.

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.

Idaho Forest Group LLC Tier I is organized into sections. They are as follows:

#### **Section 1 – Tier I Scope**

The scope describes this permitting action.

#### **Section 2 – Facility-Wide Conditions**

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

#### **Sections 3 through 4 – Emissions Unit/Source Name**

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g., opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follow the applicable requirement.

#### **Section 5 – Insignificant Activities**

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

#### **Section 6 – General Provisions**

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by

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EPA and contain all terms required by IDAPA 58.01.01 et al. as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

### 2. FACILITY INFORMATION

#### 2.1 Facility Description

Idaho Forest Group LLC produces dimensional lumber products at the Grangeville facility. The processes include log storage, debarking, sawing, planing, drying of wood, final product storage, and distribution. Steam for the production processes is generated by the Wellons boiler which is fired by wood wastes generated on site. Saleable products include dimensional lumber, wood chips, bark, and rosebud horse bedding.

#### 2.2 Facility Permitting History

##### 2.2.1 Tier I History – 5-year permit term March 20, 2008 to March 20, 2013

The following information is the permitting history of this 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).

March 20, 2008            T1-2007.0061, initial Tier I, Permit status (S)

##### 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).

February 16, 2009        PTC No. P-2008.0204 for changes to the facility name and the facility contact (A)

July 20, 2006            Modified PTC No. P-050214 for new equipment installation and production increase issued July 10, 2006 (S)

July 29, 2005            Initial PTC No. P-040214 issued July 29, 2005 (S)

### 3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

#### 3.1 Application Scope

This permitting action is a permit amendment for changes to the facility name and the facility contact in accordance with IDAPA 58.01.01.381.

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<b>Permittee:</b>	Idaho Forest Group LLC	<b>Permit No.</b>	T1-2008.0203
<b>Location:</b>	Grangeville, Idaho	<b>Facility ID No.</b>	049-00003

### 3.2 Application Chronology

December 19, 2008      DEQ received application

### 4. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This permitting action is a permit amendment for changes to the facility name and the facility contact. Typographical errors in sections of General Provision and Facility-wide Condition are corrected. No other changes are made to the facility or the permit. For detailed information on emissions units, process description(s), and emissions inventory, refer to T1-2007.0061, initial Tier I, issued March 20, 2008.

### 5. EMISSIONS LIMITS AND MRRR

This permitting action is a permit amendment for changes to the facility name and the facility contact. For detailed information on emissions limits and MRRR, refer to T1-2007.0061, initial Tier I, issued March 20, 2008.

### 6. REGULATORY REVIEW

This permitting action is a permit amendment for changes to the facility name and the facility contact. For detailed information on regulatory review, refer to T1-2007.0061, initial Tier I, issued March 20, 2008.

### 7. PUBLIC COMMENT

A public comment period is not required in accordance with IDAPA 58.01.01.381.

### 8. EPA REVIEW OF PROPOSED PERMIT

EPA review of proposed permit is not required in accordance with IDAPA 58.01.01.381.

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**Appendix – AIRS Information**

No changes are made to AIRS. For detailed AIRS information, refer to T1-2007.0061, initial Tier I, issued March 20, 2008.