



Tier I Operating Permit

No. T1-2008.0202

Final

Idaho Forest Group LLC

Athol, Idaho

Facility ID No. 055-00024

January 5, 2009

Harbi Elshafei H.E.

Permit Writer

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

1. INTRODUCTION AND APPLICABILITY

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 Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the denial. This document provides the basis for this administrative amendment for the Tier I operating permit for Idaho Forest Group LLC.

2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

2.1 Application Scope

This permit is an administrative amendment of the facility's currently effective Tier I operating permit. The amendment is to change the name of the Chilco Lake Lumber Company, LLC-dba Riley Creek-Chilco Lake Sawmill located in Athol, Idaho to Idaho Forest Group LLC. On December 12, 2008, the permittee also requested to change the names of the company's responsible official and the facility's contact, per communication with the permit writer and the plant manager.

2.2 Application Chronology

December 19, 2008 DEQ receives application for administrative amendment to change the name of the facility from Riley Creek Lumber Company to Idaho Forest Group LLC.

3. REGULATORY REVIEW

3.1 Administrative Amendment

This permit is for an administrative amendment in accordance with IDAPA 58.01.01.381 to change the name of the facility from Chilco Lake Lumber Company, LLC-dba Riley Creek-Chilco Lake Sawmill to Idaho Forest Group LLC. The new responsible official and the facility contact are included in the administrative amendment for this permit. The amendment date was added to the front page of the permit. No other changes have been made to the permit.

4. PUBLIC COMMENT

Public notice is not required for this administrative amendment in accordance with IDAPA 58.01.01.381.c.

5. EPA REVIEW OF PROPOSED PERMIT

EPA review is not required for this administrative amendment in accordance with IDAPA 58.01.01.381.c. A copy of the revised permit is being submitted to EPA.

AIRS/AFS Facility-wide Classification Form

Facility Name: Idaho Forest Group LLC
Facility Location: Athol
Facility ID: 055-00024 **Date:** 1/2/2009
Project/Permit No.: T1-2008.0202 **Completed By:** Harbi Elshafei

- Check if there are no changes to the facilitywide classification resulting from this action. (compare to form with last permit)
- Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

	SO2	PM10	VOC	
Area Classification:	U	U	U	DO NOT LEAVE ANY BLANK

Check one of the following:

- SIP [0]** - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)
- OR
- Title V [V]** - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	B	A	A	B	B	A	A

- PSD [6]** - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- NSR - NAA [7]** - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- NESHAP [8]** - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

- NSPS [9]** - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- MACT [M]** - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?