Air Quality Permitting
Statement of Basis

June 21, 2006

Tier I Operating Permit No. T1-060203

University of Idaho, Moscow

Facility ID No. 057-00025

Prepared by:

Cheryl A. Robinson, P.E., Permit Writer
AIR QUALITY DIVISION

FINAL AMENDED PERMIT

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Public Comment / Affected States / EPA Review Summary

In accordance with IDAPA 58.01.01.381.02.c, Rules for the Control of Air Pollution in Idaho, DEQ may incorporate administrative amendment changes into the Tier I operating permit without providing notice to the public or affected States provided that DEQ designates any such administrative permit amendment as having been made pursuant to Section 381. In doing so, DEQ must submit a copy of the revised permit, or an addendum, to the EPA and send the original to the permittee. These actions will be taken as part of the issuance process for this permit.

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.300, Rules for the Control of Air Pollution in Idaho, for issuing a Tier I operating permit.

2. FACILITY DESCRIPTION, FACILITY/AREA CLASSIFICATION

The facility description and the facility/area classification are not changed as part of this administrative amendment.

3. APPLICATION SCOPE

On January 25, 2006, DEQ received a request from the University of Idaho for an administrative amendment to the Tier I operating permit. The request was to change the name of the responsible official from David N. Chichester to Nancy Dunn.

On May 15, 2006, DEQ received an additional request from the University of Idaho for an administrative amendment to the Tier I operating permit. The request was to change the name of the responsible official to Lloyd Mues.

4. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this Tier I action.

4.1. Emissions Inventory

The emission inventory for the University of Idaho is not changed by this administrative amendment.

4.2. Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this Tier I operating permit.

IDAPA 58.01.01.381.02.a ..... Tier I Administrative Permit Amendments

This action is an administrative amendment to change the name of the responsible official and to implement other similar minor administrative changes in the Tier I operating permit.

IDAPA 58.01.01.381.02.c ..... Tier I Administrative Permit Amendments

In accordance with IDAPA 58.01.01.381.02.c, Rules for the Control of Air Pollution in Idaho, DEQ may incorporate administrative amendment changes into the Tier I operating permit without providing notice to the public or affected States provided that DEQ designates any such administrative permit amendment as having been made pursuant to Section 381. In doing so, DEQ must submit a copy of the revised permit, or an addendum, to the EPA and send the original to the permittee. These actions have been taken as part of the issuance process for this permit.

4.3. Fee Review

The University of Idaho is a major facility as defined in IDAPA 58.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387. As of June 19, 2006, the facility was current with its 2004 registration fees. Fees on their 2005 emissions are not due until July 1, 2006.

5. PERMIT CONDITIONS

This section summarizes the changes made to the Tier I operating permit as part of this administrative amendment.

1. On the permit cover page, the responsible official name was changed from David N. Chichester to Lloyd Mues.

2. On the permit cover page and on the header for each page of the permit, a block was added to indicate the date of this modification, and November 18, 2002, was inserted into the "Date Issued" block to accurately reflect the date that the Tier I operating permit was originally issued. All changes to the permit since the November 18, 2002, issuance date have been the result of administrative amendments.

3. On the permit cover page (Permit Authority, last paragraph), and in Section 1 of the Permit (Condition 1.2), the text was changed to indicate that the new permit supersedes the Tier I amended permit issued on May 20, 2005. The list of permits superseded by the May 20, 2005, amended permit was deleted.

4. In Section 1 of the Permit, Condition 1.1 indicates that the purpose of the permit amendment is to change the name of the responsible official. No change to the permit was needed, as the previous amendment was also to change the name of the responsible official.

5. Consistent with the June 1, 2006, DEQ format for Tier I operating permits, subheadings were added to Permit Condition 2.9, Excess Emissions.

6. In Permit Conditions 2.10 and 2.20, the telephone prefix for the DEQ Lewiston Regional Office was changed from 769 to 799.

7. Permit General Provisions in Section 7 were reviewed against DEQ's Tier I operating permit template dated June 1, 2006. Citations to applicable rules were updated to reflect current issue dates, as follows (revised text is shown in bold):

Table 5.1 UPDATED REGULATORY CITATIONS FOR PERMIT CONDITIONS

Permit Condition	Existing Text	Revised Text
7	IDAPA 58.01.01.122, 5/1/94	IDAPA 58.01.01.122, **4/5/00**
10	IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i and 380-386, 3/19/99;	IDAPA 58.01.01.200-223, **4/6/05;** IDAPA 58.01.01.322.15.i, **3/19/99;** **IDAPA 58.01.01.380-386, 7/1/02;**
15	IDAPA 58.01.01.322.10, 4/5/00;	IDAPA 58.01.01.322.10, **4/6/05;**
19	IDAPA 58.01.01.122, 322.15.m, and 325, 5/1/94;	IDAPA 58.01.01.122, **4/5/00;** **IDAPA 58.01.01.**322.15.m, 5/1/94, and **IDAPA 58.01.01.**325, **3/19/99.**
20	(no change to existing text)	Added **IDAPA 58.01.01.314.10, 4/5/00**
21	IDAPA 58.01.01.322.11, 2/5/04T	IDAPA 58.01.01.322.11, **4/6/05**

8. In Permit General Condition 19.3.3, the format for the citation to the Clean Air Act statute was corrected from 7651(g)(a) to 7651g(a).

9. Permit General Condition 21.3.2 was updated to be consistent with the current Tier I operating permit template, with the addition of a clause clarifying certification requirements. The revised condition appears as follows (the new clause is shown in italics):

21.3.2 The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. *If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information;*

10. Permit General Condition 21.4 was added to be consistent with the current Tier I operating permit template. The condition clarifies the submittal requirements for compliance certifications. The added condition appears as:

    21.4 All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

6. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.381.02.c, Rules for the Control of Air Pollution in Idaho, DEQ may incorporate administrative amendment changes into the Tier I operating permit without providing notice to the public or affected States provided that DEQ designates any such administrative permit amendment as having been made pursuant to Section 381. In doing so, DEQ must submit a copy of the revised permit, or an addendum, to the EPA and send the original to the permittee. These actions have been taken as part of the issuance process for this permit.

7. RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommend that the University of Idaho be issued final amended Tier I Operating Permit No. T1-060203. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

CR/bf Permit No. T1-060203