



Air Quality Permitting Statement of Basis

July 8, 2005

Permit to Construct No. P-050023

**Idaho Timber of Boise, LLC
Boise, ID**

Facility ID No. 001-00032

Prepared by:

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AIR QUALITY DIVISION**

FINAL

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Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
SIP	State Implementation Plan
SO ₂	sulfur dioxide
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

2. FACILITY DESCRIPTION

The facility is located at 4800 Production Avenue in Boise, Idaho. The facility manufactures high-grade lumber from pre-sawed low-grade lumber.

3. FACILITY / AREA CLASSIFICATION

The facility is classified as a natural minor (B) source. The uncontrolled potential to emit of the facility is 1.83 T/yr of PM and 1.83 T/yr of PM₁₀. These are the only regulated air pollutants emitted from the facility.

The facility is located in Ada County, in Air Quality Control Region 64, and Zone 11. The area classification is unclassifiable for all federal and state criteria air pollutants.

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at the facility. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

The application is for the name change of the facility.

4.1 *Application Chronology*

May 5, 2005	DEQ received the application
June 3, 2005	DEQ declared the application complete.

5. PERMIT ANALYSIS

This permit action is the name change of the facility. Therefore no permit analysis is required.

5.1 *Equipment Listing*

This permit action is for the name change of the facility. There are no changes to the equipment.

5.2 *Emissions Inventory*

This permit action is for the name change of the facility. Therefore, no emissions inventory is required.

5.3 *Modeling*

This permit action is for the name change of the facility. Therefore, no modeling analysis is required.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.209.04..... Revisions of Permit to Construct

The permit is issued in accordance with IDAPA 58.01.01.209.04 for the name change of the facility.

5.5 Permit Conditions Review

This permit action is for the name change of the facility. There are no changes to the permit conditions.

6. PERMIT FEES

The PTC application and processing fees do not apply to name or ownership change in accordance with IDAPA58.01.01.224.03

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

The final permit was emailed to Boise Regional Office on July 8, 2005.

7.2 Facility Review of Draft Permit

The facility didn't request to review the permit.

7.3 Public Comment

An opportunity for public comment period on the PTC application is not required for the name change of the facility.

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that Idaho Timber of Boise, LLC be issued a final PTC No. P-050023 for the name change of the facility. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

Appendix A

AIRS Information

P-050023

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: Idaho Timber of Boise, LLC
Facility Location: Boise, ID
AIRS Number: 001-00032

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO ₂								U
NO _x								U
CO								U
PM ₁₀	B						B	U
PT (Particulate)	B						B	
VOC								U
THAP (Total HAPs)								
			APPLICABLE SUBPART					

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).