State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT**
**STATEMENT OF BASIS**

# Tier I Operating Permit No. T1-2008.0187

## Final

## Potlatch Land & Lumber – Post Falls

## Post Falls, Idaho

## Facility ID No. 055-00018

**December 23, 2008**

**Bill Rogers**

**Permit Coordinator**

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier 1 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 | pounds 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 |
| $\mu g/m^3$ | micrograms per cubic meter |
| UTM | Universal Transverse Mercator |
| VOC | volatile organic compound |

## INTRODUCTION AND APPLICABILITY

Potlatch Land & Lumber – Post Falls is a particleboard manufacturing facility and is located at 401 North Potlatch Road, Post Falls, Idaho 83877. 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 NOx and VOCs above the major source threshold of 100 tons-per-year. The facility is not a major source of HAPs. As a major facility, Potlatch Land & Lumber – Post Falls 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 Potlatch Land & Lumber – Post Falls 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 Potlatch Land & Lumber – Post Falls.

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.

Potlatch Land & Lumber – Post Falls 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 T1-2008.0095 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 T1-2008.0095, issued August 12, 2008.

# 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 Corporation, Wood Products – Post Falls to Potlatch Land & Lumber – Post Falls. 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 as described above in the Application Scope. |
| December 19, 2008 | DEQ issued Administrative Amendment T1-2008.0187 for the name change. |

# 2. FACILITY INFORMATION

## 2.1 Facility Description

This facility is a particleboard manufacturing facility.

## 2.2 Facility Permitting History

2.2.1 Tier I Operating Permit History – Previous 5-year permit term August 28, 2002 to December 19, 2008

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from August 28, 2002 to December 19, 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).

The following is a chronological history of air quality permits issued to this facility:

| | |
|---|---|
| August 28, 2002 | Tier I Operating Permit No. T1-055-00018, Initial T1 (S) |
| December 10, 2002 | Tier I Operating Permit No. T1-020125, Administrative Amendment (S) |
| January 5, 2006 | Tier I Operating Permit No. T1-050105, Significant Modification to incorporate PTC No. P-050104 (Sanderdust project and HAP PTE limits to opt out of 40 CFR 63, Subpart DDDD) (S) |
| August 18, 2006 | Tier I Operating Permit No. T1-060126, Administrative Amendment, facility name change from Potlatch Corporation to Potlatch Forest Products Corp., Wood Products – Post Falls (S) |
| January 17, 2007 | Tier I Operating Permit No. T1-060110, T1 renewal (S) |
| March 8, 2007 | Tier I Operating Permit No. T1-2007.0011, Administrative Amendment, correct typographical errors (S) |

| | |
|---|---|
| August 12, 2008 | Tier I Operating Permit No. T1-2008.0095, Administrative Amendment, permit revision to acknowledge the change of Responsible Official and Facility Contact (S) |
| December 23, 2008 | Tier I Operating Permit No. T1-2008.0187, Administrative Amendment, facility name change from Potlatch Corporation to Potlatch Forest Products Corp., Wood Products – Post Falls to Potlatch Land & Lumber – Post Falls (A) |

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).

| | |
|---|---|
| January 10, 1974 | PTC, letter issued (S) |
| November 25, 1980 | PTC, letter issued (S) |
| February 1, 1985 | PTC No. 0860-0018, Initial PTC for a wood chip pre-dryer controlled with high efficiency cyclones (S) |
| May 22, 2001 | PTC No. 055-00018, PTC modification, cure monitor installation and annual particleboard production increase (S) |
| August 17, 2001 | PTC No. 055-00018, PTC modification, replace rotary dryer, cure monitor installation and annual particleboard production increase (S) |
| September 23, 2005 | PTC No. P-050104, Permit modification, sanderdust project (A) |

## 3. EMISSIONS UNITS, PROCESS DESCRIPTIONS, 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 August 12, 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 August 12, 2008.

## 5. REGULATORY REVIEW

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 August 12, 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 EPA in addition to sending the original copy to Potlatch.

## 6. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.381.02.c, 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.