



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Tier I Operating Permit No. T1-2008.0111

and

Tier II Operating Permit No. T2-2008.0112

Final Permits

Potlatch Forest Products Corporation

Lumber Drying Division, St. Maries Complex

St. Maries, Idaho

Facility ID No. 009-00030

August 18, 2008

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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

Acronyms, Units and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
CAM	compliance assurance monitoring per 40 CFR Part 64
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
ESP	electrostatic precipitator
HAPs	Hazardous Air Pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MRRR	Monitoring, Recordkeeping and Reporting Requirements
PC	permit condition
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
Tier I	Tier I operating permit
T/yr	tons per year

TIER I and TIER II OPERATING PERMIT STATEMENT OF BASIS

Permittee:	Potlatch Forest Products Corporation	Permits No.	T1-2008.0111 and T2-2008.0112
Location:	St. Maries, Idaho	Facility ID No.	009-00030

1. INTRODUCTION AND APPLICABILITY

Potlatch Forest Products Corporation - Lumber Drying Division, St. Maries Complex is a dimensional lumber drying facility located on Milltown Road at St. Maries, Idaho. 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 as described in the Statement of Basis for the Tier I Operating Permit issued on March 24, 2008.

2. FACILITY INFORMATION

2.1 Facility Description

Refer to the Statement of Basis for the Tier I Operating Permit issued on March 24, 2008.

2.2 Facility Permitting History

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).

August 19, 2008	Tier I Operating Permit No. T1-2008.0111 issued as an "administrative amendment" to change the facility name and responsible official. (A)
August 19, 2008	Tier II Operating Permit and PTC No. T2-2008.0112, issued as a "revision" to change the facility name and responsible official. (A)
March 24, 2008	Tier I Operating Permit No. T1-2007.0103 issued as a "renewal" permit. This permit is superseded by T1-2008.0111. (S)
October 3, 2007	Tier II Operating Permit and PTC No. T2-2007.0183, issued October 3, 2007. PTC termination for oil and edge seal process. This permit is superseded by T2-2008.0012 (S)
September 27, 2006	Tier I Operating Permit No. T1-040125, issued September 27, 2006. Incorporated T2-040124. This permit was superseded by T1-2007.0103. (S)
July 21, 2005	Tier II Operating Permit and PTC No. T2-040124, issued July 21, 2005. Added a CAM plan for the ESP: replace the upper and lower power input range. Name change from Potlatch Corporation to Potlatch Forest Products Corporation. This permit was superseded by T2-2007.0183. (S)
May 12, 2004	Tier II Operating Permit and PTC No. T2-020121, issued May 12, 2004. Facility-wide operating permit and PTC for Hurst boiler, four lumber drying kilns, and oil and edge seal process. This permit was superseded by T2-040124. (S)
December 24, 2002	Initial Tier I Operating Permit No. 009-00030. This permit was superseded by T1-040125. (S)

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Location:	St. Maries, Idaho	Facility ID No.	009-00030

July 21, 1999 PTC No. 009-00001, issued July 21, 1999, for the oil and edge seal process. This permit was incorporated into and superseded by T2-020121. (S)
(Note: This PTC was inadvertently issued with the number for the Potlatch St. Maries Complex that is on the Coeur d'Alene Indian Reservation. However, the permit applies to the lumber drying facility, which is located outside of the Coeur d'Alene Indian Reservation.)

3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

3.1 Application Scope

This permitting action is for an "Administrative Amendment" of the facility's Tier I operating permit and a "Revision" of the Tier II operating permit. The purpose for the amendment/revision is to make the following changes:

- Change the facility name to be "Potlatch Forest Products Corporation - Lumber Drying Division, St. Maries Complex"; and
- Change the Responsible Official to be Marc A. Mendenhall, Manufacturing Manager - North Idaho

3.2 Application Chronology

July 8, 2008 Request for Administrative Amendment was received from Potlatch
August 8, 2008 Requests for Amended Tier I and Tier II permits were determined complete
August 8, 2008 The draft amended Tier I and Tier II permits were provided for peer review

4. EMISSIONS UNITS, PROCESS DESCRIPTION(S), 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 March 24, 2008.

5. 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 March 24, 2008.

6. REGULATORY REVIEW

There was no change to the facility as part of this permit amendment; therefore, existing requirements in the Tier I and Tier II permits remain in effect and unchanged. For details about permit requirements, refer to the Statement of Basis for the Tier I Operating Permit issued on March 24, 2008.

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6.1 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 the EPA in addition to sending the original copy sent to Potlatch.

6.2 Tier II Permit Revision (IDAPA 58.01.01.404.04)

The new Tier II permit is a “revision” of the facility’s existing Tier II permit, and the facility will continue to meet all applicable requirements of Sections 400 through 410. Issuance of this permit will be per Section 404 of the Rules, except that the requirements of Subsection 404.01.c (e.g., opportunity for public comment) do not apply because this permit does not allow any increase in emissions from previously permitted levels.

6.3 Tier II Permit Revision Fee (IDAPA 58.01.01.407)

DEQ’s review of this Tier II permit “revision” did not require any review or analyses as described in Section 407.02. Therefore, a Tier II Operating Permit fee is not required.

7. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.381.02.c and 404.04, a notice to the public or affected states is not required and was not issued for this permit action.

8. EPA REVIEW OF PROPOSED PERMIT

With regard to the Tier I permit, per 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. Copies of the final permits will be sent to EPA Region 10.