



**Air Quality Permitting
Statement of Basis**

February 15, 2008

**Permit to Construct and Tier II Operating Permit
No. T2-2008.0012**

Fiber Composites, LLC, Meridian, Idaho

Facility ID No. 001-00115

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FINAL

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Acronyms, Units, and Chemical Nomenclature

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
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
HDPE	high density polyethylene
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	pound per hour
m	meter(s)
MACT	Maximum Available Control Technology
MMBtu	Million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₃	ozone
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
PTC/Tier II	permit to construct and Tier II operating permit
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
T/yr	Tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01 Sections 201 and 404.04, Rules for the Control of Air Pollution in Idaho (Rules) for Permits to Construct and Tier II operating permits.

2. FACILITY DESCRIPTION

Fiber Composites, LLC (formerly Louisiana-Pacific Corporation / LP Wood Polymers), Meridian facility, produces composite decking manufactured from wood waste and high density polyethylene (HDPE) resin. No raw materials for this process are produced on site. The wood waste, consisting of trim ends, sawdust, sticks, etc., is sourced locally. The HDPE resin, which is an odorless opaque white pellet, is produced by ExxonMobil Chemical Company in Texas. Both raw materials are transported to the Meridian facility where they are either entered directly into the manufacturing process or are stored for later use.

3. FACILITY / AREA CLASSIFICATION

Fiber Composites, LLC is defined as a minor facility because the criteria pollutant emissions do not exceed 100 tons per year. The AIRS classification is "B" because the potential to emit is less than major source thresholds.

The facility is located within AQCR 64 and UTM zone 11. The facility is located in Ada County which is designated as an attainment/maintenance area for PM₁₀ and CO, and unclassifiable for all other criteria pollutants (NO_x, SO₂, lead, and ozone). As a result of the maintenance area for PM₁₀, the facility was originally required to obtain a Tier II operating permit, and specific permit conditions were included in the State Implementation Plan for Idaho (as discussed in the Regulatory Review section).

The AIRS information provided in the Appendix defines the classification for each regulated air pollutant at Fiber Composites, LLC. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

DEQ initiated this Permit to Construct and Tier II operating permit (PTC/Tier II) revision to correct typographical errors.

4.1 *Application Chronology*

February 1, 2008	DEQ initiated this PTC/Tier II revision
February 6, 2008	Draft permit was provided to Boise Regional Office for review

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC/Tier II.

5.1 *Equipment Listing*

This revision does not cause any changes to the equipment listing. Table 5.1 is taken from the statement of basis for PTC/Tier II No. T2-2007.0119, issued January 8, 2008. Table 5.1 provides a list of the regulated sources in this permit.

Table 5.1 SUMMARY OF EMISSIONS SOURCES AND EMISSIONS CONTROLS

Emissions Source Description	Emissions Control
Trim End Hog	10 RA Baghouse (C17)
Wood Storage Silo	8 RA Baghouse (C18)
Primary Hammermill	Donaldson Baghouse (C3)
Secondary Hammermill	Big Mac Baghouse (C22)
Storage Silo	Noltec Storage Silo Baghouse (C1A)
Wood Dryer #1	Entec Dryer #1 Baghouse (C15)
Wood Dryer #2	Entec Dryer #2 Baghouse (C16)
Finishing Line #1	Line #10 Molder Baghouse (C12)
Finishing Line #2	Line #11 Molder Baghouse (C13)
Finishing Line #4	Line #12 Molder Baghouse (C21)
HDPE Storage Silo #4	HDPE Silo Bin Vent #1 (C7)
Dry Wood Day Bin #1	Dry Wood Day Bin Filter #1 (C23)
Dry Wood Day Bin #2	Dry Wood Day Bin Filter #2 (C24)

5.2 Emissions Inventory

This revision does not cause any changes to the emissions. Table 5.2 is taken from the statement of basis for PTC/Tier II No. T2-2007.0119, issued January 8, 2008.

Table 5.2 SUMMARY OF EMISSION RATE LIMITS

Emissions Point	Hourly PM ₁₀ Emissions (lb/hr)	Annual PM ₁₀ Emissions (T/yr) ^a
10 RA Baghouse (C17)	0.87	3.80
8 RA Baghouse (C18)	0.39	1.73
Donaldson Baghouse (C3)	0.279	1.22
Big Mac Baghouse (C22)	0.48	2.09
Noltec Storage Silo Baghouse (C1A)	0.014	0.06
Entec Dryer #1 Baghouse (C15)	0.39	1.73
Entec Dryer #2 Baghouse (C16)	0.39	1.73
Line #10 Molder Baghouse (C12)	0.26	1.13
Line #11 Molder Baghouse (C13)	0.27	1.19
Line #12 Molder Baghouse (C21)	0.25	1.10
HDPE Silo Bin Vent #1 (C7)	0.034	0.150
Dry Wood Day Bin Filter #1 (C23)	0.020	0.086
Dry Wood Day Bin Filter #2 (C24)	0.020	0.086
Total	2.79	16.10

a. Assumes 8,760 hr/yr operations.

5.3 Modeling

This revision does not cause any changes to the emission units and their emissions. Therefore, modeling is not required.

5.4 Regulatory Review

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

IDAPA 58.01.01.404.04..... Permit Revision or Renewal

This permit revision does not change the applicability of the regulations of the original Tier II operating permit issued July 12, 2002 and PTC No. P-050039 issued March 7, 2006. This permit revision is subject to IDAPA 58.01.01.404.04 Permit Revision or Renewal.

5.5 Fee Review

In accordance with IDAPA 58.01.01.407.02.b, this revision is exempt from the processing fee.

6. PERMIT CONDITIONS

This section only summarizes the changes made to an existing PTC/Tier II. New text is shown in bold. Deletions are shown as strikethrough text.

6.1 New Permit Condition (PC) 1.1 replaces the existing PC 1.1 with the changes. It reads:

“DEQ has initiated this Permit to Construct (PTC) and Tier II operating permit (Tier II) revision to correct typographical errors. The existing PTC/Tier II No. 2007-0129, issued January 8, 2008, was for This permitting action is a SIP Tier II renewal, and incorporates administrative emission unit name changes, a facility name change due to an ownership change, and incorporating PTC No. P-050039, issued March 7, 2006. This permitting action also incorporates a name change from an ownership change. The facility was formerly LP Wood Polymers, also known as Louisiana-Pacific Corporation.”

6.2 New PC 1.2 replaced the existing PC 1.2 with the changes. It reads:

~~“This PTC/Tier II operating permit renewal incorporates and replaces the following permits, the terms and conditions of which shall no longer apply:~~

- **PTC/Tier II No. T2-2007.0129, issued January 8, 2008**
- Permit to Construct No. P-050039, issued March 7, 2006
- Tier II Operating Permit No. ~~001-00115T2-000037~~, issued July 12, 2002”

6.3 New PC 2.6 was existing PC 2.6 with a minor change to be consistent with the current template. It reads:

~~“...The records shall include, at a minimum, include the date that each complaint was received and a description of the following...”~~

6.4 New PC 2.10 was existing PC 2.10 with a minor change to be consistent with the current template. It reads

~~“The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, the Rules for Control of Open Burning, IDAPA 58.01.01.600-617.”~~

6.5 New PC 2.14 was existing PC 2.14 with minor changes to be consistent with the current template. It reads:

~~No person~~**The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur...**

6.6 New General Provision 1 was existing General Provision 1 with minor changes to be consistent with the current template. It reads:

“...The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.”

6.7 New General Provision 2 was existing General Provision 2 with a minor change to be consistent with the current template. It reads:

“[IDAPA 58.01.01.211, **405**, 5/1/94]”

6.8 New General Provision 3 was existing General Provision 3 with a minor change to be consistent with the current template. It reads:

“[IDAPA 58.01.01.212.01, **406**, 5/1/94]”

6.9 New General Provision 7 was existing General Provision 7 with a minor change to be consistent with the current template. It reads:

“[IDAPA 58.01.01.211, **405**, 5/1/94]”

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

The draft permit was provided to Boise Regional Office for review on February 6, 2008. No comments were received.

7.2 Facility Review of Draft Permit

Facility draft review was not requested by the applicant.

7.3 Public Comment

In accordance with IDAPA 58.01.01.404.04, a public comment period is not required because the proposed project is a permit revision with no authorized increase in allowable emissions.

SYC/hp Permit No. P or T2-2008.0012

APPENDIX – AIRS INFORMATION

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

Facility Name: Fiber Composites, LLC
Facility Location: Meridian, Idaho
AIRS Number: 001-00115

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	B							U
NO _x	B							U
CO	B							A
PM ₁₀	B							A
PT (Particulate)	B							---
VOC	B							U
THAP (Total HAPs)	B							---
			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).