



Air Quality Permitting
Technical Memorandum

Permit to Construct No. 021-00002

LOUISIANA-PACIFIC CORP.
BONNERS FERRY, IDAHO

Prepared By:

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Environmental Quality Management, Inc.

Project No. P-010112

Date Prepared:

June 21, 2002

Permit Status:

FINAL

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 (PTC).

PROJECT DESCRIPTION

In processing the Tier 1 application for the Louisiana-Pacific Corp.'s lumber mill (LP Bonners Ferry) (formerly owned by Crown Pacific Limited Partnership), it was discovered that an error was made in issuing a PTC on October 26, 1999, that included emission limits for a planer shavings baghouse. This action is to correct that error.

SUMMARY OF EVENTS

On October 26, 1999, the Idaho Department of Environmental Quality (DEQ) issued a revised PTC for the Bonners Ferry lumber mill which involved the addition of new drying kilns and an increase in production capacity. The October 26 permit did not involve any physical or operational changes to the planer or planer shavings baghouse, which had previously been permitted on August 19, 1999. Nonetheless, the October 26 permit significantly reduced the allowed particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers or less (PM₁₀) emissions from the planer shavings baghouse from 3.09 pounds per hour (lb/hr) and 13.52 tons per year (T/yr) to 0.03 lb/hr and 0.12 T/yr (a 100-fold decrease).

A public comment period for the draft permit was held from April 11 through May 13, 2002. No comments were received from any party.

DISCUSSION

1. Process Description

The facility is not adding any additional equipment or modifying the process equipment at the plant.

2. Equipment Listing

The planer shavings baghouse is as follows:

Manufacturer:	Clark Sheet Metal Inc.
Model:	60-20
Flow:	30,000 actual cubic feet per minute
Air/Cloth Ratio:	9.76:1
% Efficiency:	99+
Estimated Emissions:	0.005 grains per dry standard cubic foot (gr/dscf) (for particulate matter and PM ₁₀)

3. Emission Estimates

Crown Pacific installed a baghouse on the planer shavings cyclone in August 1999. This control device was installed so they would no longer have to monitor and record visible emissions, as was required by their existing PTC. The installation of the baghouse, and the removal of the visible emissions monitoring and recording requirements, was made enforceable through a PTC dated August 19, 1999. The allowable PM₁₀ emissions from the planer shavings cyclone were 3.09 lb/hr and 13.52 T/yr; however, they were not adjusted in the August 19 permit to include the control efficiency of the newly installed baghouse. The August 19 permit should have set allowable PM₁₀ emissions at 1.29 lb/hr and 5.63 T/yr. These emission rates are based on Crown Pacific's estimated grain loading of 0.005 gr/dscf.

So, to more accurately reflect emissions from the planer shavings baghouse, this permitting action limits PM₁₀ to 1.29 lb/hr and 5.63 T/yr.

4. Modeling

Modeling was not required because actual emissions are not increasing. This permit amendment simply corrects the error made in permit allowables in the October 26, 1999, permit.

5. Facility Classification

The facility is a major facility as defined by IDAPA 58.01.01.006.54, but it is not a Prevention of Significant Deterioration (PSD) major facility because it does not emit or have the potential to emit a regulated pollutant in excess of any PSD threshold. This facility is not subject to any New Source Performance Standards (NSPS), in accordance with 40 CFR, Part 60; National Emission Standards for Hazardous Air Pollutants (NESHAP), in accordance with 40 CFR, Part 61; National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT), in accordance with 40 CFR, Part 63. The Standard Industrial Classification Code defining the facility is 2421. The facility is classified as "A" for the AIRS database.

6. Area Classification

The area in which the facility is located is classified as attainment or unclassifiable.

7. Regulatory Review

IDAPA 58.01.01.201 - Permit to Construct Required

The facility is an air pollution-emitting source subject to PTC No. 021-00002 for which a revision is appropriate prior to incorporation into a Tier 1 permit.

IDAPA 58.01.01.210 - Demonstration of Preconstruction Compliance with Toxic Standards

There are no toxic emissions associated with the planer baghouse.

IDAPA 58.01.01.577 - Ambient Air Quality Standards for Specific Air Pollutants

Appendix A from the October 26, 1999, PTC details the PM₁₀ ambient impact. The source, in aggregate, is expected to impact the air at a 14 micrograms per cubic meter 24-hour concentration.

40 CFR 52 - Prevention of Significant Deterioration

This source is non-designated and has a potential to emit of 164 T/yr of volatile organic compounds. The source is minor for PSD purposes.

40 CFR 60 - New Source Performance Standards

The planer and its baghouse are not affected by any NSPS.

40 CFR 61 and 63 - National Emission Standards for Hazardous Air Pollutants and MACT

This source is considered an area source for hazardous air pollutants. This means the potential to emit of hazardous pollutants is below 10 T/yr for any one pollutant and below 25 T/yr in combination. There is not a source specific MACT or NESHAP for this facility.

8. Permit Requirements

This permit amendment limits PM₁₀ emissions from the planer shavings baghouse to 1.29 lb/hr and 5.63 T/yr. This permitting action does not involve any other changes to the permit.

9. Permit Coordination

This amendment will be issued concurrently with the facility's Tier I operating permit.

10. AIRS Information

This permitting action is not an increase in emissions; therefore, the AIRS database does not have to be changed.

FEES *

LP Bonners Ferry is a major facility as defined in IDAPA 58.01.01.008.10 and is subject to registration and registration fees, in accordance with IDAPA 58.01.01.526. The source has paid all applicable fees.

RECOMMENDATION

Based on review of all applicable state and federal rules and regulations, staff recommends LP Bonners Ferry be issued modified PTC No. 021-00002 for the planer shavings cyclone. The project does not involve PSD permitting requirements. A public comment period was held for the draft permit. No comments were received and no entity requested a hearing.

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cc: Pat Rayne, AFS
Tom Harman, Coeur d'Alene Regional Office
Joan Lechtenberg, Air Quality Division
Source File (021-00002)

ATTACHMENT

ABBREVIATED AIRS DATA ENTRY SHEET

Name of Facility: LP Bonners Ferry
AIRS/Permit #: PTC 021-00002
Permit Issue Date: Pending

<u>Source/Emissions Unit Name</u> (25 spaces) (Please use name as indicated in permit)	<u>SCC #</u> (8 digit #)	<u>Air Program</u> (SIP/NESHAP/NSPS/PSD)
Planer Shaving Bin Baghouse	3-07-008-3	SIP

RETURN TO PAT RAYNE
AIRS-PT.LST (9/95)