

Statement of Basis

**Permit to Construct No. P-2008.0062
Project ID 61857**

**Stimson Lumber Company Priest River
Priest River, Idaho**

Facility ID 017-00001

Final

May 5, 2017
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Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
Btu	British thermal units
CAA	Clean Air Act
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
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 _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SCL	significant contribution limits
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit

TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compounds
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

Stimson Lumber has not proposed to change the purpose and function of the existing facility. The facility process description is included below as it appears in the previous permit action.

Logs are brought from the log yard in to the sawmill and debarked. Residual materials is collected and used for hog fuel and bark product. The debarked logs continue into the sawmill and are cut. Again residual material is collected, generally as chips, which are sold. The sawn lumber proceeds to the kilns where it is dried, then to the planer for final processing to client specifications. Larger wood waste is used as hogged-fuel, chips are collected and sold and shavings are captured and sold.

Kilns operate using steam heat and the steam is provided by one of the two on-site hogged fuel boilers, the 24 MM Btu/hr output EPI fluidized-bed boiler and the 16,000 lbs steam per hour Wellons grate boiler. Both are fueled only from on-site hogged fuel.

Permitting History

The following 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).

May 17, 1978	Permit in form of a letter for Hogged Fuel Boiler, Permit was revised May 29, 2001 solely to reflect a name change, Permit status (S)
October 8, 1998	PTC No. P-980094, modification of Kiln No. 1 for the establishment of production limits, and emission limits. Permit revised May 29, 2001 to reflect name change, Permit status (S)
March 31, 2011	P-2008.0062, Initial "facility-wide" PTC, Permit status (S)
January 3, 2013	P-2008.0062 Proj. 61134, DEQ initiated permit revision to limit steaming rate and remove obsolete permit conditions, Permit status (S)
January 16, 2015	P-2008.0062 Proj. 61431, modification to add the provisions of 40 CFR 63 Subpart JJJJJ, Permit status (A, but will become S upon issuance of this permit)

Application Scope

This PTC is a revision of an existing PTC. This application is solely a request to revise the steam production averaging time for the EPI boiler from a 3-hour averaging period to a 24-hour averaging period.

Application Chronology

March 7, 2017	DEQ received an application and an application fee.
March 20, 2017	DEQ determined that the application was complete.
March 24, 2017	DEQ made available the draft permit and statement of basis for peer and regional office review.
April 5, 2017	DEQ made available the draft permit and statement of basis for applicant review.
May 2, 2017	DEQ received the permit processing fee.
May 5, 2017	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

This permitting action is not commencement of construction of a new stationary source or a physical or operational change resulting in an increase of emissions or the emission of a pollutant not previously emitted. Because neither of these events is occurring, NSR is not triggered.

This permitting action is to revise the steam production averaging time for the EPI boiler from a 3-hour averaging period to a 24-hour averaging period. Air pollutant emissions from this facility do not increase as a result of this action, therefore, a revised EI was not developed and a technical analysis was not conducted. See the March 23, 2011 Statement of Basis for the equipment listing and emission inventory.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Bonner County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For THAPs (Total Hazardous Air Pollutants) Only:

- A = Use when any one HAP has actual or potential emissions ≥ 10 T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions ≥ 25 T/yr.
- SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits ≥ 8 T/yr of a single HAP or ≥ 20 T/yr of THAP.
- SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to < 8 T/yr of a single HAP and/or < 20 T/yr of THAP.
- B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold
- UNK = Class is unknown

For All Other Pollutants:

- A = Actual or potential emissions of a pollutant are ≥ 100 T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are ≥ 80 T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are < 80 T/yr.
- B = Actual and potential emissions are < 100 T/yr without permit restrictions.
- UNK = Class is unknown.

Table 1 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	99	100	SM80
PM ₁₀	99	100	SM80
PM _{2.5}	99	100	SM80
SO ₂	2.12	100	B
NO _x	68.41	100	B
CO	70.91	100	B
VOC	90.32	100	SM80
HAP (single)	8.78	10	B
HAP (total)	13.96	25	B
Pb	---	100	B

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the modified emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400-410 were not applicable to this permitting action.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for criteria pollutants or 10 tons per year for any one HAP or 25 tons per year for all HAP combined. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52.21(b)(1). Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements 40 CFR Part 60.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

The facility has proposed to operate as a minor source of hazardous air pollutant (HAP) emissions, and is subject to the requirements of 40 CFR 63, Subpart JJJJJ–National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. DEQ is not delegated this Subpart. See the January 15, 2015 Statement of Basis for a detailed regulatory review.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Revised Permit Condition 1.1

The purpose of this permitting action is described. The permittee has requested to revise the steam production averaging time for the EPI boiler from a 3-hour averaging period to a 24-hour averaging period.

Revised Permit Condition 1.3

This permit condition has been revised to reflect that this permit will replace the PTC issued on January 16, 2015.

Revised Table 1.1

This table has been revised to include the rated steam capacity and fuel source of the EPI and Wellons Boilers.

Revised Permit Condition 3.6

This permit condition has been revised to change the steam production averaging time for the EPI boiler from a 3-hour averaging period to a 24-hour averaging period. The particulate emission thresholds were based on daily and annual rates and modeling for particulate matter is required to meet daily and annual limits. In 40 CFR 63 Subpart JJJJJ, the opacity standard is based upon a daily block average, while other standards are based upon a rolling 30-day daily average. This change is supported by the analysis in the previous permitting action.

Revised Permit Condition 3.17

This permit condition has been revised to monitor and record the steam production rate based on a consecutive 24 hour average to demonstrate compliance with the EPI Boiler steam production rate.

All other permit conditions remain unchanged.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.

APPENDIX A – FACILITY DRAFT COMMENTS

The facility had no comments on the facility draft permit on April 25, 2017.

APPENDIX B – PROCESSING FEE

PTC Processing Fee Calculation Worksheet

Instructions:

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: **Stimson Lumber Company Priest**
 Address: **12 Old Priest River Road**
 City: **Priest River**
 State: **ID**
 Zip Code: **83856**
 Facility Contact: **David Balfanz**
 Title: **Assistant Plant Manager**
 AIRS No.: **017-00001**

N

Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

Y

Did this permit require engineering analysis? Y/N

N

Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	0	0.0
SO ₂	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	0.0	0	0.0
Fee Due	\$ 1,000.00		

Comments: