

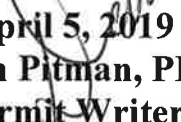
Statement of Basis

**Permit to Construct No. P-2019.0010
Project ID 62186**

**Classic Kitchen Doors
Meridian, Idaho**

Facility ID 001-00185

Final


**April 5, 2019
Dan Pitman, PE
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.

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
FACILITY INFORMATION	4
Description	4
Permitting History	4
Application Scope	4
Application Chronology	4
TECHNICAL ANALYSIS	4
Emissions Units and Control Equipment	4
Emissions Inventories	5
Ambient Air Quality Impact Analyses	5
REGULATORY ANALYSIS.....	5
Attainment Designation (40 CFR 81.313)	5
Facility Classification.....	5
Permit to Construct (IDAPA 58.01.01.201).....	6
Tier II Operating Permit (IDAPA 58.01.01.401)	6
Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70).....	6
PSD Classification (40 CFR 52.21)	6
NSPS/NESHAP Applicability (40 CFR 60, 61 & 63)	7
Permit Conditions Review	7
PUBLIC REVIEW.....	8
Public Comment Opportunity	8
APPENDIX A – PROCESSING FEE	9

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

Btu	British thermal units
cfm	cubic feet per minute
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
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
MMBtu	million British thermal units
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
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
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
SIP	State Implementation Plan
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/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

Classic Kitchen Doors operates a variety of woodworking equipment to produce custom cabinet doors, drawer fronts, custom moldings, and millwork. This equipment is controlled by four cyclones.

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).

April 1, 2003 T2-000735, Initial Permit for the Facility, Permit status (A, but will become S upon issuance of this permit)

Application Scope

The permittee has requested to convert the existing Tier II operating permit and PTC to a PTC. The permittee has not proposed any physical or operational changes. The requirement to convert the Tier II operating permit and PTC to a PTC is specified in a Consent Order, Case Number E-2016.0003 dated September 2, 2016.

Application Chronology

February 15, 2019 DEQ received an application.
 February 20, 2019 DEQ received an application fee.
 February 28, 2019 DEQ made available the draft permit and statement of basis for peer and regional office review.
 March 7, 2019 DEQ determined that the application was complete.
 March 7, 2019 DEQ made available the draft permit and statement of basis for applicant review.
 April 2, 2019 DEQ received the permit processing fee.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Permit Section	Source	Control Equipment
2	Natural gas-fired space heaters (3) - 0.115 MMBtu/hr (each) Sawdust storage bins (3) Truck loadout	None
3	General woodworking equipment (a detailed listing is not required for this permit)	Cyclone #1 - 5,000 acfm Cyclone #2 - 15,000 acfm Cyclone #3 - 10,000 acfm Cyclone #4 - 10,000 acfm

Emissions Inventories

This permitting action is solely a conversion of Tier II operating permit and PTC to a PTC. An emission inventory was not provided and one is not required. The March 28, 2003, technical analysis for the previous permit includes emissions details; see Content Manager record #2011AAG3722.

Ambient Air Quality Impact Analyses

Allowable emissions do not increase and an ambient air quality impact assessment is not required.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Ada 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 HAPs (Hazardous Air Pollutants) Only:

- A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.
- SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.
- SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.
- B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.
- UNK = Class is unknown.

For All Other Pollutants:

- A = Use when permitted emissions of a pollutant are > 100 T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.
- B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 100 T/yr major source threshold.
- UNK = Class is unknown.

Table 2 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	UNK	18	100	UNK
PM ₁₀	UNK	9	100	UNK
PM _{2.5}	UNK	UNK	100	UNK
SO ₂	UNK	UNK	100	UNK
NO _x	UNK	UNK	100	UNK
CO	UNK	UNK	100	UNK
VOC	UNK	UNK	100	UNK
HAP (single)	UNK	UNK	10	UNK
Total HAPs	UNK	UNK	25	UNK

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

As required by Consent Order, Case Number E-2016.0003 dated August 24, 2016, the applicant has requested to convert the existing Tier II operating permit and PTC to a PTC.

The facility has not requested to modify the facility.

All of the provisions that exist in the existing Tier II operating permit and PTC originate because the facility "...was modified without first obtaining a PTC¹." Therefore, the Tier II operating permit can be cancelled and the permit issued as a PTC².

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 PM₁₀, PM_{2.5}, SO₂, NO_x, CO, and VOC 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. 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.

¹ March 28, 2003 Technical Analysis, page 4 Content Manager record # 2011AAG3722

² Standard Operating Procedure Convert An Existing Tier II Operating Permit (T2) to a Permit to Construct, Content Manager record # 2011ACF5

NSPS/NESHAP Applicability (40 CFR 60, 61 & 63)

This permitting action is solely to convert the existing Tier II operating permit and PTC to a PTC. No modifications are proposed to the facility and there are no newly applicable NSPS or NESHAP regulations.

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.

Existing Permit Conditions 2.8

This monitoring and recordkeeping requirement is now general provision 4.10 of the permit; this requirement has been removed from Section 2 of the permit.

Revised Permit Condition 3.3

This condition has been revised as indicated in the following table with strikeouts, and underlined text indicating additions.

Description	PM Emissions ^{a)}		PM ₁₀ Emissions ^{a)}	
	Hourly	Annual	Hourly	Annual
	(hr/yr) (lb/hr)	(T/yr)	(hr/yr) (lb/hr)	(T/yr)
#1 Cyclone	1.29	5.63 <u>2.68</u>	0.64	2.82 <u>1.33</u>
#2 Cyclone	3.86	16.89 <u>8.03</u>	1.93	8.45 <u>4.01</u>
#3 Cyclone	1.93	4.01	0.97	2.02
#4 Cyclone	1.93	4.01	0.97	2.02
Total	9.01	18.73	4.51	9.36

a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.

Pound per hour limits were labeled as hour per year (hr/yr) limits, this has been corrected to indicate that the unit of the emissions rate limit is pounds per hour.

The permit limits each cyclone to 4,160 hours per year of operations. The annual emissions of cyclone #1 and #2 were much greater than the pound per hour limit times 4,160 hours; this has been corrected so that the ton per year emission rate limit matches the hourly rate times 4,160 hours divided by 2,000.

The row showing the total emissions included annual totals that did not add up to the total of the individual cyclone limits. Rather than correct these values the "Total" row has been removed from the table.

A footnote was added indicating that compliance is assured by complying with the permit requirements unless credible evidence suggests otherwise. This is standard language for current emission rate limits.

Revised Permit Condition 3.6

This condition was revised as indicated by the following strikeout and underlined additions:

~~Within 60 days of issuance of this permit, t~~The permittee shall have developed an Operations & Maintenance (O&M) manual for the cyclones. The manual shall be updated as necessary and shall include, at a minimum, the following:

- Normal operating conditions, parameters, and procedures.
- Guidelines for normal maintenance and inspection schedules and procedures.

The manual shall remain on site at all times and shall be made available to Department representatives upon request.

“Within 60 days of issuance of this permit” has been removed. This requirement was required to be fulfilled over 15 years ago and has been removed from the permit.

Section 4 of the Permit

The General Provisions of Section 4 of the permit have been updated to the current conditions.

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.

APPENDIX A – 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: Classic Kitchen Doors
Address: 208 East Bower Street
City: Meridian
State: ID
Zip Code: 83642
Facility Contact: Bret Jones
Title: President
AIRS No.: 001-00185

- 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
Total:	0.0	0	0.0
Fee Due	\$ 1,000.00		

Comments: No change in actual allowable emissions at the facility. Per DEQ guidance, "Clarifications and Interpretations", an engineering analysis has occurred because emission limits were changed. Pound per hour values that were limited to 4,160 hours per year are converted to ton per year emissions limits to correct existing values in the permit table. Actual allowable ton per year values do not increase because the pound per hour emissions are limited to 4160 hours per year.