



Air Quality Permitting Statement of Basis

March 14, 2005

Permit to Construct No. P-040119

Coeur d'Alene Fiber Fuels, Inc., Coeur d'Alene

Facility ID No. 055-00029

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FINAL PERMIT

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Acronyms, Units, and Chemical Nomenclatures

DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho

1. 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.

2. FACILITY DESCRIPTION

Coeur d'Alene Fiber Fuels Inc., (CDAFF) is a wood pellet manufacturing facility.

3. APPLICATION SCOPE

CDAFF submitted an application to correct errors in their recently issued PTC.

3.1 *Application Chronology*

August 16, 2004

DEQ received a request to revise their recently issued PTC

4. PERMIT ANALYSIS

CDAFF requested that DEQ revise two permit terms. Permit Condition 3.7 required the facility to operate an automatic shutoff device on the wood-fired burner. The unit is not equipped with such a device. Instead the wood-fired burner is monitored and adjusted by an operator during drying. The applicant proposed to monitor and record the hourly burner temperature. Permit Condition 3.16 now requires CDAFF to monitor and record the burner operating temperature on an hourly basis to demonstrate compliance with the 1200°F minimum burner temperature. The 1200°F burner operating temperature is the manufacturer's recommended minimum operating temperature for the burner unit.

CDAFF also requested that the dryer daily average production rate monitoring requirement be revised (Permit Condition 3.14). The dryer operation is run in batches and an accurate daily production rate can not be measured. The applicant proposed monitoring the monthly production rate and the hours of operation for each month. Each month they will calculate the average hourly production rate of the dryer to demonstrate compliance with the permitted production rate.

DEQ added a requirement that visible fugitive dust emissions not be observed crossing the facility boundary for a period or periods aggregating more than three minutes in any consecutive 60-minute period. This permit condition was requested by DEQ's Coeur d'Alene regional office to ensure that fugitive emissions from the receiving area and other processes are reasonably controlled. DEQ added a monthly monitoring requirement for fugitive emissions. The results of each fugitive emissions inspection are to be recorded and the records are to be maintained on-site.

5.5 *Fee Review*

Permit to construct application fees and processing fees do not apply to this permit revision to correct typographical errors.

5. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.209.01.c, an opportunity for public comment is not required because there is not an increase in emissions.

6. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that CDAFF be issued revised PTC No. P-040119. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

DH/sd

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