

# **Statement of Basis**

**Permit to Construct No. P-2013.0064  
Project ID 62121**

**Idaho Veneer Company  
Post Falls, Idaho**

**Facility ID 055-00004**

**Final**

**November 01, 2018**

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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

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 <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	CO <sub>2</sub> equivalent emissions
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
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
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 <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O <sub>2</sub>	oxygen
PC	permit condition
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	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
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
VOC	volatile organic compounds
µg/m <sup>3</sup>	micrograms per cubic meter

## FACILITY INFORMATION

### **Description**

Idaho Veneer Company (Idaho Veneer) is located in Post Falls, Idaho and produces veneer and board lumber. The facility includes a natural gas boiler which produces steam to heat the steam chambers, dry kilns, and veneer dryers; a standby gas-fired boiler to heat the Cremona veneer dryer and steam chambers; two lumber dry kilns; cyclones controlling the planer; wood byproduct storage and loadout; and one veneer dryer.

The facility is primarily a cant and tie mill. Logs are first debarked in one of two debarkers. Rotary veneer is produced by conditioning the wood in steam chambers, turning the logs on a lathe, and drying the veneer in a Cremona dryer. Smaller, thin veneer is produced by squaring the logs (called cants) with a band saw, conditioning the cants in steam chambers, processing through one of four slicers, and drying in a Cremona dryer. Steam is produced by a Cleaver Brooks 13,800 pound steam per hour NG fired boiler. The Thermopack boiler heats the Cremona dryer. Boards can be produced from the portions of wood cut off during the initial cutting for the veneer process and from logs that are not veneer grade. That material goes through various sawing and trimming operations, is dried in one of two steam-heated dry kilns, planed to final dimension, trimmed to length, and shipped out via truck.

### **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).

March 25, 2015	This PTC is for a minor modification at an existing minor facility, and also converts a PTC/Tier II combo permit to a PTC because the requested changes make all permit conditions PTC-applicable. The applicant has proposed to use the facility's Cleaver Brooks NG fired boiler as their primary steam producer, and switch the Wellons 40,000 pounds steam per hour hog fuel fired boiler, previously the primary boiler, into a supporting or backup role. Making this change will modify all permit conditions such that they are PTC requirements, and not Tier II requirements, eliminating the need for a combo permit. Therefore, the permit will be issued as a PTC and will no longer require a Tier II component. (A, but will become S upon issuance of this permit).
August 22, 2013	PTC/Tier II Operating Permit No. T2-2008.0115 was issued to renew the existing Permit to Construct (PTC) and Tier II operating permit (Tier II) and to revise the terms of the permit to more accurately address the conditions of the facility's operations. In addition, the permit was revised <i>on August 22, 2013</i> to incorporate the results of the September 2012 source test. Permit status (A, but will become S upon issuance of this permit).
December 23, 2008	PTC/Tier II Operating Permit No. T2-2008.0115 was issued to modify the existing PTC/Tier II permit to adequately address the current emission units and the emissions produced from these units emitted into the air for the facility. Permit status (S)
February 20, 2003	PTC/Tier II was issued to incorporate the requirements of existing permits, to limit the facility emissions to below major facility classification and to protect ambient air quality standards. Permit status (S)
February 13, 1998	PTC was issued for the lumber dry kilns. Permit status (S)
December 24, 1993	A PTC was issued for the installation of the Cremona veneer dryer, which was revised and reissued on June 11, 1998, Permit status (S)

## Application Scope

This PTC is a revision of an existing PTC. The applicant has proposed to decommission the Wellons hog-fuel boiler.

## Application Chronology

September 25, 2018	DEQ received an application.
September 26, 2018	DEQ received an application fee.
September 28, 2018	DEQ determined that the application was complete.
October 4, 2018	DEQ made available the draft permit and statement of basis for peer and regional office review.
October 12, 2018	DEQ made available the draft permit and statement of basis for applicant review.
October 25, 2018	DEQ received the permit processing fee.
November 1, 2018	DEQ issued the final permit and statement of basis.

## TECHNICAL ANALYSIS

### Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emission Point ID No.
B-2	<u>Cleaver Brooks Stand by Boiler</u> Manufacturer: Cleaver Brooks Rated heat capacity: 13.2 MMlbs steam/hr Installed: 1971 Fuels: Natural gas	None	B-2
B-3	<u>Thermopack Boiler</u> Manufacturer: Thermopack Rated heat capacity: 600,000 Btu/hr Installed: 1980 Fuels: Natural gas	None	B-3
P-10 A-C & P-11 A-C	<u>Wellons Dry Kiln No. 1 and Coe</u> Dry Kiln No. 2 Size rated: 1370 bdf/hr each	None	P-10 A-C & P-11 A-C
P-1	<u>Cremona Dryer</u> Rating: 10,000 ft <sup>2</sup> /hr (3/8" veneer) Steam Chambers (6)	None	P-1
P-38 AND P-55 P-39 P-13 P-14 P-14 P-17 P-54	<u>Cyclones</u> Planer Cyclone No.1 and No. 2 (P-38 and P-55) Sawdust Cyclone (P-39) Jointer Cyclone (P-13) Resaw Cyclone (P-14) Sawmill Chipper Cyclone (P-17) Veneer Chipper Cyclone (P-54)	None	P-38 AND P-55 P-39 P-13 P-14 P-17 P-54

## Emissions Inventories

### Potential to Emit

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the two natural gas fired boiler, drying chambers, kilns, and cyclones at the facility (see Appendix A) associated with this proposed project. Emissions estimates of criteria pollutant, HAP PTE were based on emission factors from AP-42, operation of 1,526 hours per year, and process information specific to the facility for this proposed project.

### Uncontrolled Potential to Emit

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a “Synthetic Minor” source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for regulated air pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A of Statement of Basis (SOB) for P-2013.0064, project 61310, issued March 25, 2015, for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this veneer mill operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8736 hr/yr.

**Table 2 Uncontrolled Potential to Emit for Regulated Air Pollutants**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
<b>Point Sources</b>					
Cleaver Brooks Boiler	0.16	0.01	2.10	1.76	0.12
Thermopack Boiler	0.02	0.00	0.30	0.25	0.02
Kilns, Dryer, Steam Chambers	8.6	0.00	0.00	0.00	14.2
Combined Cyclones	1.7	0.00	0.00	0.00	0.00
<b>Total</b>	<b>10.48</b>	<b>0.01</b>	<b>2.40</b>	<b>2.01</b>	<b>14.34</b>

Because the Wellon’s boiler has been removed, the facility is changed from Synthetic Minor (SM) to minor (B).

The following table presents the uncontrolled Potential to Emit for HAP pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A of P-2013.0064, project 61310 for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this veneer mill operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8736 hr/yr. Then, the worst-case maximum HAP Potential to Emit was determined for this veneer mill operation.

**Table 3 Uncontrolled Potential to Emit For Hazardous Air Pollutants**

Hazardous Air Pollutants	PTE (T/yr)
Methanol	1.395
Formald	0.131
Acetalde hyde	0.250
Propionaldehyde	0.013
Benzene	0.003
Toluene	0.006
o-xylene	0.007
Acrolein	0.007
MEK	0.023
Dichlorobenzene	2.88E-05
Hexane	0.043
<b>Total</b>	<b>1.87</b>

**Pre-Project Potential to Emit**

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

The following table presents the pre-project potential to emit for all criteria pollutants from all emissions units at the facility based on the SOB for P-2013.0064, project 61310, issued March 25, 2015.

**Table 4 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>
Wellons Boiler	6.9	16.1	0.54	1.26	4.74	11.1	12.94	30.2	0.37	0.85
Cleaver Brooks and Thermopack boilers combined	0.11	0.18	0.01	0.01	1.4	2.4	1.18	2.02	0.07	0.13
Kilns, Dryer, Steam Chambers	0.00	8.6	0.00	0.00	0.00	0.00	0.00	0.00	3.35	14.2
Combined Cyclones	0.00	1.7	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Pre-Project Totals</b>	<b>7.01</b>	<b>26.58</b>	<b>0.55</b>	<b>1.27</b>	<b>6.14</b>	<b>13.50</b>	<b>14.12</b>	<b>32.22</b>	<b>3.79</b>	<b>15.18</b>

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
- b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

**Post Project Potential to Emit**

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility's classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria pollutants from all emissions units at the facility as determined by DEQ staff.

**Table 5 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>
Cleaver Brooks Boiler	0.037	0.160	0.003	0.01	0.48	2.10	0.404	1.76	0.026	0.12
Thermopack Boiler	0.004	0.023	0.000	0.002	0.05	0.3	0.049	0.25	0.003	0.02
Kilns, Dryer, Steam Chambers	0.00	8.6	0.00	0.00	0.00	0.00	0.00	0.00	3.25	14.2
Combined Cyclones	0.00	1.7	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Post Project Totals</b>	<b>0.04</b>	<b>10.48</b>	<b>0.00</b>	<b>0.01</b>	<b>0.53</b>	<b>2.40</b>	<b>0.45</b>	<b>2.01</b>	<b>3.28</b>	<b>14.34</b>

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
- b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

**Change in Potential to Emit**

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

**Table 6 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	7.01	26.58	0.55	1.27	6.14	13.50	14.12	32.22	3.79	15.18
Post Project Potential to Emit	0.04	10.48	0.00	0.01	0.53	2.40	0.45	2.01	3.28	14.34
<b>Changes in Potential to Emit<sup>(1)</sup></b>	<b>-6.97</b>	<b>-16.10</b>	<b>-0.55</b>	<b>-1.26</b>	<b>-5.61</b>	<b>-11.10</b>	<b>-13.67</b>	<b>-30.21</b>	<b>-0.51</b>	<b>-0.84</b>

1) Reduction in emissions resulting from removal of the Wellons boiler from the emissions inventory. The entire emissions inventory can be found in Appendix A of the SOB associated with P-2013.0064, project 61310, issued March 25, 2015.

**TAP Emissions**

Due to the reduction of emissions, no TAP emission increases are associated with this project.

***Ambient Air Quality Impact Analyses***

No ambient air quality impact analysis was required because the modification was an overall reduction of pollutants and no threshold increases were achieved to trigger such an analysis.

***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 7 Regulated Air Pollutant Facility Classification**

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	10.48	10.48	100	B
PM <sub>10</sub>	10.48	10.48	100	B
PM <sub>2.5</sub>	10.48	10.48	100	B
SO <sub>2</sub>	0.01	0.01	100	B
NO <sub>x</sub>	2.4	2.4	100	B
CO	2.02	2.02	100	B
VOC	14.34	14.34	100	B
HAP (single)	1.4	<1.4	10	B
Total HAPs	1.9	<1.9	25	B

**REGULATORY ANALYSIS**

***Attainment Designation (40 CFR 81.313)***

The facility is located in Kootenai County, which is designated as attainment or unclassifiable for PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

***Facility Classification***

“Synthetic Minor” classification for criteria pollutants is defined as the uncontrolled Potential to Emit for criteria pollutants are above the applicable major source thresholds and the Potential to Emit for criteria pollutants fall below the applicable major source thresholds.

This facility has previously been determined to be a synthetic minor facility. Therefore, because the Wellons boiler has been removed, and emissions have been decreased, this SOB does not require that the SM classification be reanalyzed.

***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.

***Visible Emissions (IDAPA 58.01.01.625)***

IDAPA 58.01.01.625 ..... Visible Emissions

The sources of PM emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.7 and 2.8.

**Standards for New Sources (IDAPA 58.01.01.676)**

IDAPA 58.01.01.676 ..... Standards for New Sources

The fuel burning equipment located at this facility, with a maximum rated input of ten (10) million BTU per hour or more, are subject to a particulate matter limitation of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting gaseous fuels. Fuel-Burning Equipment is defined as any furnace, boiler, apparatus, stack and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer. This requirement is assured by Permit Condition 2.12.

**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 PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, and HAP or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. 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.

**NSPS Applicability (40 CFR 60)**

The facility has two boilers. Subparts Db and Dc are potentially applicable.

The Cleaver Brooks boiler is NG fired, was installed in 1971, and is rated at 4.94 MMBtu/hr.

The Thermopack boiler is NG fired, was installed in 1980, and is rated at 0.6 MMBtu/hr.

Subpart Db applies to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984. None of these boilers meet the criteria. Therefore, Subpart Db does not apply.

Subpart Dc applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989. These boilers were all constructed prior to that date. Therefore, Subpart Dc does not apply.

**NESHAP Applicability (40 CFR 61)**

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

**MACT/GACT Applicability (40 CFR 63)**

NESHAP 40 CFR 63 Subpart JJJJJ was applicable when the hog fuel boiler was being operated. With the decommissioning of the Wellons hog fuel boiler, the subpart is no longer applicable.

## **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.

### Permit Section 1 - Scope

*The scope was changed to describe this project, which is decommissioning the Wellons hog-fuel boiler. The Regulated Sources Table 1.1 was change to remove the Wellons boiler and associated cyclones.*

### Permit Section 2 – Facility-Wide Conditions

*There were no changes made to this section of the permit.*

### Permit Section 3– Boilers

*Permit Conditions 3.1 through 3.6 were edited to remove any reference to the Wellons hog-fuel boiler. Since the boiler has been removed, the remainder of the permit conditions for the 40 CFR 63, Subpart JJJJJ requirements were removed because they no longer apply. Natural gas consumption remained the same, as the Wellon's boiler was being used for back-up; therefore, there was no boiler heat load to replace with natural gas.*

### Permit Section 4– Dry Kilns And Veneer Dryers

*There were no changes made to this section of the permit.*

### Permit Section 5– Cyclones

*The cyclones associated with hog fuel were removed from Table 5.1. Permit Condition 5.6 was edited to omit references to the hog fuel. This permit condition for monitoring throughput assures compliance based on operational design capacity. It is left as close to the original as possible so as not to confuse the permittee.*

### Permit Section 6– General Provisions

*These permit conditions were updated to current template requirements.*

## **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 – 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:** Idaho Veneer Company  
**Address:** PO Box 339  
**City:** Post Falls  
**State:** ID  
**Zip Code:** 83877  
**Facility Contact:** Patrick Malloy  
**Title:** President of Operations  
**AIRS No.:** 055-00004

- 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)

<b>Emissions Inventory</b>			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO <sub>x</sub>	0.0	11.1	-11.1
SO <sub>2</sub>	0.0	1.26	-1.3
CO	0.0	30.21	-30.2
PM10	0.0	16.1	-16.1
VOC	0.0	0.84	-0.8
<b>Total:</b>	<b>0.0</b>	<b>59.51</b>	<b>-59.5</b>
Fee Due	<b>\$ 1,000.00</b>		

**Comments:** Engineering work included development of the emissions inventory for the remaining boilers and an up to date review of applicable requirements.