



**Air Quality Permitting
Statement of Basis**

March 25, 2005

Permit to Construct No. P-040120

Enyeart Cedar Products, LLC, Smeltonville

Facility ID No. 079-00006

Prepared by:

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FINAL

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Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AP-42	Compilation of emission factors published by EPA
AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
MMbdf/yr	million board feet per year
MMBtu/hr	million British thermal units per hour
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
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
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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

Enyeart Cedar Products, LLC owns and operates a re-saw, dry kiln, and planer mill facility in Smelterville, Idaho.

Green and dry lumber is delivered to the facility. Some of the material is cut to size in the re-sawing facility. Sawdust from the re-saw is transferred pneumatically into the sawdust and shavings bin. Material collected in the bin is loaded into trucks and transported offsite.

Green lumber is dried in the dry kiln or allowed to dry naturally. The dry kiln is directly heated by a natural gas burner, which has a heat input capacity of 3.5 MMBtu/hr. Dried lumber is planed in the planer mill. Shavings and trim from the planer mill are shredded in a hammer-hog and transferred via belt conveyor to the sawdust and shavings bin. Planed lumber is packaged for sale and hauled off-site by trucks. The entire property is paved with asphalt.

3. FACILITY / AREA CLASSIFICATION

Enyeart Cedar Products, LLC is classified as a natural minor (B) facility because its potential to emit any criteria air pollutant is less than 100 T/yr, and the emissions of any hazardous air pollutant or combination of hazardous air pollutants is less than 10 T/yr or 25 T/yr, respectively.

The facility is located within AQCR 62 and UTM zone 11. The facility is located in Smelterville County which is designated as unclassifiable for all criteria pollutants (PM₁₀, CO, NO_x, SO₂, lead, and ozone).

The AIRS information provided in the Section 9 of the statement of basis defines the classification for each regulated air pollutant at this facility. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

Per applicant's request, this permit modifies the PTC issued July 18, 2003. The changes are:

- The responsible official is changed to Ron Enyeart, the owner of the facility.
- The limit on operating hour is removed from the permit. The limit on hours of operation serves no purpose but to add an unnecessary permit condition. Emissions from the dry kiln and burner are based on throughput. Dried lumber throughput is limited to 13.0 MMbdft/yr. Since throughput is limited, the resulting emissions are also limited.
- The emissions inventory provided in the permit application uses emissions factors that were updated in AP-42 from those used in the original 1995 analysis. Potential emissions for all criteria air pollutants are shown to decrease when compared to the former allowable emissions limits when using the updated emission factors.

- Only PM₁₀ and VOC emissions are limited in the permit. PM₁₀ and VOCs are the primary pollutants emitted from dry kilns, therefore, these pollutants are specifically limited. NO_x, SO₂, CO, and lead are all emitted at rates that are less than 10% of significant. Previous air quality modeling conducted in 1995 at the conservative emission rates (refer to the third bullet above) predicted compliance with air quality standards. Consequently, these pollutants will not cause or contribute to a violation of any air quality standard and do not need to be specifically limited.

4.1 Application Chronology

September 22, 2004	DEQ received the PTC application from Lorenzen Engineering, Inc. on behalf of Enyeart. The applicant requested to review the facility draft before final permit issuance. The permit number for the application is assigned as P-040120.
October 20, 2004	DEQ declared the application complete.
December 17, 2004	DEQ issued facility draft permit to Enyeart.
February 7, 2005	DEQ received the facility's comments on the draft permit.

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC action.

5.1 Equipment Listing

Re-saw, dry kiln and natural gas-fired burner, and planer mill.

5.2 Emissions Inventory

The applicant submitted an emissions inventory in their permit application. Based on its review by DEQ, the emission inventory accurately reflects emissions from this facility.

5.3 Modeling

Modeling was not required for this permit revision because emissions are not increasing.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.209.04..... Revisions of Permits to Construct

"The Director may approve a revision of any permit to construct provided the stationary source or facility continues to meet all applicable requirements of Sections 200 through 228. Revised permits will be issued pursuant to procedures for issuing permits (Section 209), except that the requirements of Subsections 209.01.c., 209.02.a., and 209.02.b., shall only apply if the permit revision results in an increase in emissions authorized by the permit or if deemed appropriate by the Director."

The applicant requested to revise PTC No. P-030114, issued July 18, 2003, as described in this document. Because there is not an increase in emissions, an opportunity for public comment is not required, nor is a public comment period.

5.5 Fee Review

The applicant submitted a PTC application fee of \$1,000 as required by IDAPA 58.01.01.224. The fee was paid September 22, 2004. A processing fee of \$500.00 was received February 22, 2005.

5.6 Regional Review of Draft Permit

The regional office provided the comments on the draft permit on December 17, 2004. The comments were addressed in the permit and the statement of basis.

5.7 Facility Review of Draft Concurrence

DEQ received the facility's comments on the draft permit on February 7, 2005. The comments were addressed in the permit and the statement of basis.

6. PERMIT CONDITIONS

This section discusses only those changes made as requested by the applicant.

- 6.1 The Purpose has been updated to reflect this permit revision.
- 6.2 The Process Description, Permit Condition 2.1, has been revised to more accurately describe the process.
- 6.3 PM₁₀ and VOC emissions are specifically regulated in Permit Condition 2.3.
- 6.4 The hours of operation requirement (Permit Condition 2.4 in PTC No. P-030114) has been deleted.
- 6.5 The requirement to burn only natural gas in the dry kiln burner has been added to make the emissions limits enforceable.
- 6.6 Reasonable control fugitive requirement was added to the permit.

7. PUBLIC COMMENT

An opportunity for public comment and a public comment period was not required because emissions are not increasing.

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommends that Enyeart Cedar Products, LLC be issued final PTC No. 040120 for the revisions discussed in this document. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

9. AIRS INFORMATION

Table 9.1 AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION
POLLUTANT							A – Attainment U – Unclassifiable N – Nonattainment
SO ₂	B						U
NO _x	B						U
CO	B						U
PM ₁₀	B						U
PT (Particulate)	B						
VOC	B						U
THAP (Total HAPs)	B						
			APPLICABLE SUBPART				

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

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