



State of Idaho  
Department of Environmental Quality  
Air Quality Division

**AIR QUALITY PERMIT  
STATEMENT OF BASIS**

**Permit to Construct No. P-2007.0196**

**Final**

**Council School District**

**Council, Idaho**

**Facility ID No. 003-00006**

**October 12, 2007**

  
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**Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01.200, 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   |
| AFS               | AIRS Facility Subsystem  |
| AIRS              | Aerometric Information Retrieval System  |
| AQCR              | Air Quality Control Region   |
| ASTM              | American Society for Testing and Materials   |
| BACT              | Best Available Control Technology  |
| Btu               | British thermal unit   |
| CAA               | Clean Air Act  |
| CFR               | Code of Federal Regulations  |
| CO                | carbon monoxide  |
| DEQ               | Department of Environmental Quality  |
| gr                | grain (1 lb = 7,000 grains)  |
| dscf              | dry standard cubic feet  |
| EPA               | U.S. Environmental Protection Agency   |
| gpm               | gallons per minute   |
| HAPs              | Hazardous Air Pollutants   |
| hp                | horsepower   |
| IDAPA             | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| lb/hr             | pound per hour   |
| m                 | meter(s)   |
| MACT              | Maximum Achievable Control Technology  |
| MMBtu             | million British thermal units  |
| 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   |
| PC                | permit condition   |
| PM                | particulate matter   |
| PM <sub>10</sub>  | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| ppm               | parts per million  |
| PSD               | Prevention of Significant Deterioration  |
| PTC               | permit to construct  |
| PTE               | potential to emit  |
| Rules             | Rules for the Control of Air Pollution in Idaho  |
| scf               | standard cubic feet  |
| SIC               | Standard Industrial Classification   |
| SIP               | State Implementation Plan  |
| SM                | Synthetic Minor  |
| SO <sub>2</sub>   | sulfur dioxide   |
| SO <sub>x</sub>   | sulfur oxides  |
| T/yr              | tons per year  |
| µg/m <sup>3</sup> | micrograms per cubic meter   |
| UTM               | Universal Transverse Mercator  |
| VOC               | volatile organic compound  |

## STATEMENT OF BASIS

|                   |                         |                                  |
|-------------------|-------------------------|----------------------------------|
| <b>Permittee:</b> | Council School District | <b>Permit No.:</b> P-2007.0196   |
| <b>Location:</b>  | Council, Idaho          | <b>Facility ID No.</b> 003-00006 |

### 1. FACILITY INFORMATION

#### 1.1 Facility Description

The Council School District includes one elementary school and one secondary school. A wood-fired boiler will be used to provide hot water for space heating of the schools and a greenhouse.

#### 1.2 Permitting History

This permit action is a revision to the initial PTC issued to the Council School District for the wood-fired boiler. 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).

September 23, 2005

PTC No. P-050022 initial PTC for wood-fired boiler (S)

### 2. APPLICATION SCOPE

The facility did not submit an application for this permit revision. DEQ re-opened the permit to change the particulate matter grain loading standard to the correct standard. No other changes are being made to the permit.

### 3. TECHNICAL ANALYSIS

This permit revision does not require a technical analysis, emission inventory, or modeling analysis. The original technical analysis developed to support the issuance of the September 23, 2007 permit to construct remains the same. Emissions from the facility remain unchanged.

### 4. REGULATORY REVIEW

#### 4.1 Attainment Designation (40 CFR 81.313)

The facility is located in Adams County, which is designated as attainment or unclassifiable for PM<sub>10</sub>, CO, NO<sub>2</sub>, SO<sub>2</sub>, and Ozone. Reference 40 CFR 81.313.

#### 4.2 Permit to Construct (IDAPA 58.01.01.201)

According to the procedures for issuing permits to construct, IDAPA 58.01.01.209.04 DEQ is revising the permit to construct to include the correct particulate matter grain loading standard for wood combustion in boilers less than 10 million Btu/hr. All other permit conditions remain the same. The facility continues to meet all applicable requirements of Section 200 through 228.

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

The facility's potential to emit is less than major facility thresholds for both criteria and hazardous air pollutants; therefore, the facility is a minor facility.

### 4.4 PSD Classification (40 CFR 52.21)

The facility's potential to emit is less than major facility thresholds for PSD.

### 4.5 NSPS Applicability (40 CFR 60)

The facility does not have an NSPS affected facility. The wood-fired boiler has an input capacity of less than 10 million Btu/hr.

### 4.6 NESHAP Applicability (40 CFR 61)

The facility does not have any NESHAP affected emission units.

### 4.7 MACT Applicability (40 CFR 63)

The facility's potential to emit HAPs is below major facility thresholds, and there are not any MACT affected emission units at the facility.

### 4.8 CAM Applicability (40 CFR 64)

The facility is not a Title V major facility; therefore, CAM is not applicable to this facility.

### 4.9 Permit Conditions Review

This section describes only those permit conditions (PC) that have been added, revised, modified or deleted as a result of this permitting action. All other permit conditions remain unchanged.

Existing PC 2.5

#### **Fuel-Burning Equipment – Particulate Matter Standards**

The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

Revised PC 2.5

#### **Fuel-Burning Equipment – Particulate Matter Standards**

The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.200 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products in accordance with IDAPA 58.01.01.677.

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The existing permit condition was revised to include the correct particulate matter grain loading standard for combustion of wood in units with an input capacity of less than 10 million Btu/hr.

The cover page of the permit and the general provisions were also updated to current templates.

### 5. PERMIT FEES

Permit to construct application and processing fees do not apply because the facility did not submit an application, and DEQ is correcting the permit to include the particulate matter grain loading standard that should have been included in the initial permit.

### 6. PUBLIC COMMENT

This permit to construct action is a revision to the original permit in accordance with IDAPA 8.01.01.209.04. An opportunity for public comment is not required for permit to construct revisions provided that the revision does not result in an increase of emissions authorized by the permit. This permit to construct revision is solely a correction to the particulate matter grain loading standard for fuel burning equipment; emissions do not change as a result of this administrative action.

## **APPENDIX A – AIRS INFORMATION**

## AIRS/AFS<sup>a</sup> FACILITY-WIDE CLASSIFICATION<sup>b</sup> DATA ENTRY FORM

**Facility Name:** Council School District #13  
**Facility Location:** Council, ID  
**AIRS Number:** 003-00006

| AIR PROGRAM<br>POLLUTANT | SIP | PSD | NSPS<br>(Part 60)         | NESHAP<br>(Part 61) | MACT<br>(Part 63) | SM80 | TITLE V | AREA CLASSIFICATION<br>A-Attainment<br>U-Unclassified<br>N- Nonattainment |
|--------------------------|-----|-----|---------------------------|---------------------|-------------------|------|---------|---|
| SO <sub>2</sub>          | B   |     |                           |                     |                   |      | B       | U   |
| NO <sub>x</sub>          | B   |     |                           |                     |                   |      | B       | U   |
| CO                       | B   |     |                           |                     |                   |      | B       | U   |
| PM <sub>10</sub>         | B   |     |                           |                     |                   |      | B       | U   |
| PT (Particulate)         | B   |     |                           |                     |                   |      |         |   |
| VOC                      | B   |     |                           |                     |                   |      | B       | U   |
| THAP (Total HAPs)        | B   |     |                           |                     |                   |      | B       |   |
|                          |     |     | <b>APPLICABLE SUBPART</b> |                     |                   |      |         |   |
|                          |     |     |                           |                     |                   |      |         |   |

<sup>a</sup> Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

<sup>b</sup> AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- 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).