



Air Quality Permitting Statement of Basis

July 25, 2006

Permit to Construct No. P-060023

**Univar USA Inc.
Boise, ID**

Facility ID No. 001-00096

Prepared by:

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AIR QUALITY DIVISION**

FINAL

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Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
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
lb/yr	pound per year
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NOx	nitrogen oxides
NSPS	New Source Performance Standards
PM₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO₂	sulfur dioxide
T/yr	tons per year
UTM	Univarsal 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

The facility is conducting groundwater vapor extraction and treatment operations in the vicinity of Pier I store at the Boise Town Square Mall.

3. FACILITY / AREA CLASSIFICATION

Univar USA Inc. is classified as a minor facility because Univar USA Inc. potential to emit is less than major source thresholds without requiring limits. The AIRS classification is "B." The primary Standard Industrial Classification (SIC) code for the facility is 5619.

The facility is located within AQCR 63 and UTM zone 12. The facility is located in Ada County which is designated as a maintenance area for PM₁₀ and CO, and attainment or unclassifiable for the other regulated criteria pollutants (NO_x, SO₂, lead, and ozone).

The AIRS information provided in Appendix defines the classification for each regulated air pollutant at Univar USA Inc. This required information is entered into the EPA AIRs database.

4. APPLICATION SCOPE

The permittee requested a company name change to the permit. A PTC revision was required because the transfer request was not received in a timely manner according to IDAPA 58.01.01.209.06.

4.1 *Application Chronology*

June 1, 2006	DEQ received the PTC application.
June 30, 2006	DEQ determined the PTC application complete.
August 4, 2006	DEQ issued the final permit.

5. PERMIT ANALYSIS

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

5.1 *Equipment Listing*

There is no change to the equipment.

5.2 *Emissions Inventory*

There is no change to the emissions inventory.

5.3 *Modeling*

The modeling is not required, because there is no emissions increase or equipment change.

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 Permit to Construct

The permittee requested a company name change to the permit. None of the permit conditions change, nor do the regulations which are applicable to the facility change.

5.5 Permit Conditions Review

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

- 5.5.1 “Van Waters and Rogers Inc.” was replaced with “Univar USA Inc.” throughout the permit.
- 5.5.2 The permit was issued using current template. No permit conditions were changed.
- 5.5.3 The general provision in the former permit was replaced with the most updated one obtained from the template.
- 5.5.4 “T/yr” was corrected to “lb/yr” for emissions limits in the permit.

6. PERMIT FEES

In accordance with IDAPA 58.01.01.224.03, PTC application fee and processing fee are not required, because this is a company name change.

7. PERMIT REVIEW

7.1 Regional Review of Draft Permit

The draft final permit was provided to Boise Regional Office for review on July 25, 2006.

7.2 Facility Review of Draft Permit

The facility didn't request a draft permit review.

7.3 Public Comment

In accordance with IDAPA 58.01.01.209.04, an opportunity for public comment period is not required, because there is no emissions increase.

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that Univar USA Inc. be issued final PTC No. 060023 for a company name change to the permit.

SYC/bf Permit No. P-060023

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Appendix

AIRS Information

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

Facility Name: Univar USA Inc.
Facility Location: Boise, Idaho
AIRS Number: 001-00096

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION
								A-Attainment U-Unclassified N- Nonattainment
SO ₂	---							---
NO _x	---							---
CO	---							---
PM ₁₀	---							---
PT (Particulate)	---							
VOC	B							U
THAP (Total HAPs)	B						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 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).