



Air Quality Permitting Technical Memorandum

March 28, 2003

**Tier II Operating Permit and Permit to Construct
No. T2-000735**

**Classic kitchen doors, inc.
Meridian, Idaho**

AIRS Facility No. 001-00185

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FINAL

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LIST OF 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
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPS	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act.
lb/hr	pound per hour
MACT	Maximum Available Control Technology
MMBtu/hr	million British thermal units per hour
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
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/hr	tons per hour
T/yr	tons per year
VOC	volatile organic compound

PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01, Sections 200 et seq. and 404.04, *Rules for the Control of Air Pollution in Idaho*, for Permits to Construct and for Tier II operating permits.

PROJECT DESCRIPTION

Classic Kitchen Doors submitted a PTC application for their woodworking facility which was modified without first obtaining a PTC. Rather than issue a PTC for an existing source, a combined PTC and Tier II operating permit is being issued instead.

The emission sources at the facility are as follows:

Table 1. EMISSION SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Natural gas-fired space heaters (3) - 0.115 MMBtu/hr (each) Sawdust storage bins (3) Truck loadout	None
3	Woodworking equipment (detailed listing not needed to implement this permit)	Cyclone #1 - 5,000 acfm Cyclone #2 - 15,000 acfm Cyclone #3 - 7,500 acfm Cyclone #4 - 7,500 acfm

Because emissions from the woodworking equipment are dependent on grain loading and air flow through the cyclones and not the number and types of pieces of equipment, a detailed listing of the equipment vented to each cyclone is not included in the permit.

FACILITY DESCRIPTION

Classic Kitchen Doors operates a variety of woodworking equipment to produce custom cabinet doors, drawer fronts, custom moldings, and millwork. This equipment is controlled by four cyclones, only two of which are currently in operation. The facility requested that all four cyclones be included in the permit.

SUMMARY OF EVENTS

- January 31, 2001 Classic Kitchen Doors submitted a PTC application to DEQ.
- October 1, 2001 The application was determined to be incomplete.
- May 23, 2002 Classic Kitchen Doors responded to the Incompleteness letter.
- November 22, 2002 A facility draft permit was issued to Classic Kitchen for their review.
- January 23, 2003 A proposed permit was issued for public comment.
- Jan 31 - Feb 3, 2003 A 30 day public comment period was held on the proposed permit.
- February 3, 2003 Comments were received from Classic Kitchen. Department responses to comments are attached as Appendix D of this memo.

DISCUSSION

1. Emission Estimates

Potential criteria pollutant emissions from the woodworking cyclones are presented in Appendix A.

2. Modeling

Environmental Quality Management, Inc. (EQ) conducted a modeling analysis using the ISCST3 model to demonstrate compliance with the PM₁₀ National Ambient Air Quality Standards (NAAQS).

Based on comments received from Classic Kitchen during the public comment period, cyclone PM/PM₁₀ emissions will be going down both on a daily and annual basis. The annual allowable PM emissions will be going down because there will be annual hours of operations restriction imposed. Daily emissions on two cyclones will go down because the ventilation system flow rate will be reduced, thereby reducing the theoretical emission calculation. Original modeling conducted by EQM was based on all cyclones operating 8,760 hours per year. Remodeling based on the reduced hours of operations is not warranted.

A report on the modeling is presented in Appendix B.

3. Area Classification

Classic Kitchen Doors is located in Ada County, Idaho, in AQCR 64. The area is classified non-attainment for PM₁₀ and CO and attainment or unclassifiable for all other federal and state criteria air pollutants.

4. Facility Classification

The facility is not a designated facility as defined in IDAPA 58.01.01.006.27. The AFS classification for this facility is "B" source because actual and potential emissions of all criteria pollutants are less than 100 T/yr.

5. Regulatory Review

This operating permit and PTC is subject to the following permitting requirements:

- | | |
|--------------------------------------|---|
| a. <u>IDAPA 58.01.01.401</u> | Tier II Operating Permit |
| b. <u>IDAPA 58.01.01.403</u> | Permit Requirements for Tier II Sources |
| c. <u>IDAPA 58.01.01.404.01(c)</u> | Opportunity for Public Comment |
| d. <u>IDAPA 58.01.01.404.04</u> | Authority to Revise or Renew Operating Permits |
| e. <u>IDAPA 58.01.01.406</u> | Obligation to Comply |
| f. <u>IDAPA 58.01.01.470</u> | Permit Application Fees for Tier II Permits |
| g. <u>IDAPA 58.01.01.625</u> | Visible Emission Limitation |
| h. <u>IDAPA 58.01.01.650</u> | General Rules for the Control of Fugitive Dust |
| i. <u>IDAPA 58.01.01.677</u> | Particulate Matter from Minor and Existing Fuel-burning Equipment |
| j. <u>IDAPA 58.01.01.200 et seq.</u> | Requirements for Permits to Construct |

6. Permit Conditions

A. Emission Limits - Cyclones

Because PM and PM₁₀ emissions exceed 10% of the significant emission rates in IDAPA 58.01.01.006.92, the permit includes PM and PM₁₀ emission limits from the cyclones controlling the woodworking equipment.

No source testing requirement is included in the permit due to the expense for a small operation and the small emission rates involved. Compliance will be ensured by the proper operation and maintenance (O&M) of the cyclones as set forth in an O&M manual to be prepared by the permittee.

Based on a request from the applicant during the public comment period, a permit condition was added which limits the hours of operation of each cyclone such that allowable emissions are reduced.

B. Emission Limits - Natural Gas-fired Space Heaters

The space heaters are subject to the 20% opacity limit in IDAPA 58.08.01.01.625 and 0.015 gr/dscf in IDAPA 58.01.01.677. These requirements are covered in the facility-wide conditions of the permit. No monitoring, recordkeeping, or reporting conditions are included for these requirements because of the extremely small likelihood of a violation for these minor combustion sources.

C. Stack Discharge Configuration

Because compliance with the PM₁₀ National Ambient Air Quality Standards (NAAQS) is dependent on emissions from the cyclones being exhausted vertically with no obstructions (as discussed in Appendix B), a condition requiring this discharge configuration has been included. The other option would be to restrict operating hours on the cyclones to 3.44 hours per day (with an associated requirement for operating hour meters on the cyclone fans to ensure compliance). The vertical discharge requirement was judged to be less disruptive to the facility.

7. AIRS

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

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

^a 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).

FEES

Classic Kitchen will be required to pay Tier II fee of \$500.00 in accordance with IDAPA 58.01.01.470. This Tier II fee was applicable at the time the original permit application was submitted on February 7, 2001.

RECOMMENDATIONS

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends DEQ issue a final PTC and Tier II operating permit to Classic Kitchen Doors. An opportunity for public comment on the air quality aspects of the proposed operating permit has been provided in accordance with IDAPA 58.01.01.404.01.c.

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cc: Mike McGown, Boise Regional Office

APPENDIX A

POTENTIAL EMISSIONS FROM CYCLONES

Classic Kitchen Doors - Cyclone Potential Emissions

Description	Flow Rate (acfm)	PM	PM ₁₀	Operating Hours (hr/yr)	Potential		Potential	
		Grain	Grain		PM Emissions		PM ₁₀ Emissions	
		Loading (gr/acf)	Loading (gr/acf)		Hourly (lb/hr)	Annual (ton/yr)	Hourly (lb/hr)	Annual (ton/yr)
Cyclone #1	5000	0.03	0.015	4160	1.29	5.63	0.64	2.82
Cyclone #2	15000	0.03	0.015	4160	3.86	16.89	1.93	8.45
Cyclone #3	7500	0.03	0.015	4160	1.93	11.26	1.29	5.63
Cyclone #4	7500	0.03	0.015	4160	1.93	11.26	1.29	5.63
TOTAL					9.01	18.73	4.51	9.38

APPENDIX B

MODELING REPORT

REPORT ON MODELING ANALYSIS FOR CLASSIC KITCHEN DOORS, INC.

1. SUMMARY:

The pollutant identified in this Tier II application that is subject to the requirements of modeling was particulate matter with an aerodynamic diameter less than or equal to a nominal 10 μm (PM_{10}). This modeling analysis indicates that an unobstructed vertical release from the cyclones (thus allowing vertical momentum) is necessary to ensure that Classic Kitchen Doors meets the NAAQS.

2. DISCUSSION:

2.1 Applicable Air Quality Impact Limits

This facility is located in Northern Ada County which is designated a PM_{10} non-attainment area. As part of this Tier II application, the dispersion modeling analysis compared facility impacts (including background concentrations) to the NAAQS. Table 1 lists the applicable NAAQS.

Table 1. Applicable regulatory limits

Pollutant	Averaging Period	Significant Contribution Levels ($\mu\text{g}/\text{m}^3$) ^{a, b}	Regulatory Limit ($\mu\text{g}/\text{m}^3$) ^c
PM_{10}	Annual	1	50
	24-hour	5	150

^a IDAPA 58.01.01.006.93
^b Micrograms per cubic meter
^c IDAPA 58.01.01.577 for criteria pollutants

2.2 Background Concentrations

When conducting NAAQS modeling for non-PSD sources (i.e., Classic Kitchen Doors, Inc.), sources not explicitly included in the model are taken into account by adding a background concentration. These concentrations were taken from measurements of ambient air pollutants in Meridian. Table 2 lists the background concentrations that were used in the calculation of the total NAAQS concentration.

Table 2. Ambient Air Background Concentrations

Pollutant	Averaging Period	Background Concentration ($\mu\text{g}/\text{m}^3$)
PM_{10}	Annual	28.5
	24-hour	90

Source: IDEQ – Meridian, Idaho air pollutant measurement data

2.3 Modeling Impact Assessment

The procedures in the State of Idaho's *Air Quality Modeling Guideline* (DEQ 2002), as well as the EPA documents *Guideline on Air Quality Models* (EPA 2001) were followed in conducting the modeling analysis.

The Industrial Source Complex Model (ISC), including the Plume Rise Model Enhancements Model (PRIME), version 99020, was used in the compliance evaluation. All regulatory default options were used in the modeling. The area surrounding the facility within 3 kilometers is rural in nature; even though incorporated Meridian is immediately north of the site. Per discussion with IDEQ, the rural land use classification was used in the modeling.

The remainder of the modeling analysis describes the emission rates, source parameters, building downwash parameters, ambient air boundary, receptor network, elevation data, meteorological data, and compliance evaluation.

The short-term and annual emissions limits in the permit were used in the modeling of the Classic Kitchen Doors Inc. Permitting Project and are shown in Table 3.

Tables 4 and 5 present the stack information for modeled scenarios with and without permit conditions on the stack release configuration. Because cyclones 1, 3, and 4 have rain caps and cyclone 2 has a horizontal discharge from momentum, flux needs to be neglected. Per IDEQ guidance, both horizontal releases and rain cap obstructions are assumed to have 0.001 meters per second exit velocity. Horizontal sources are further modified by assuming a 0.001 meter exit diameter. Table 4 lists these assumptions.

Table 5 shows these same sources with a permit condition that is required to bring the facility in compliance with the NAAQS. The stack parameters listed in this table are based on installing vertical stacks (with rain flaps if the facility chooses) to allow vertical momentum (i.e., actual stack exit velocities).

Table 3. Short-term and Annual Emissions Used in Modeling the Classic Kitchen Doors Project

Emissions Source	Modeling Source ID	Hours Per Year	Short and Long-Term Emissions	
			PM ₁₀ (lb/hr)	PM ₁₀ (tpy)
Sawdust Collection Bin #1	CYCLONE 1	8,760	0.64	2.82
Sawdust Collection Bin #1	CYCLONE 2	8,760	1.93	8.45
Sawdust Collection Bin #2	CYCLONE 3	8,760	1.29	5.63
Sawdust Collection Bin #3	CYCLONE 4	8,760	1.29	5.63
Total			5.15	8.14

Table 4. Modeled Stack Parameters Without Permit Conditions on Release Configuration

Source ID	Coordinates		Base Elevation, (ft)	Stack Egress Parameters			
	UTMx (m)	UTMy, (m)		Height (ft)	Temp. (°F)	Exit Velocity (m/s)	Diameter (m)
CYCLONE 1 ^a	549,345	4,828,343	2,607	42	68	0.001	0.6096
CYCLONE 2 ^b	549,345	4,828,345	2,607	50	68	0.001	0.001
CYCLONE 3 ^a	549,345	4,828,348	2,607	44	68	0.001	0.6096
CYCLONE 4 ^a	549,345	4,828,352	2,607	44	68	0.001	0.6096

^a Cyclones 1, 3, and 4 have rain caps.

^b Cyclone 2 has a horizontal discharge.

Table 5. Modeled Stack Parameters With Permit Conditions on Release Configuration

Source ID	Coordinates		Base Elevation (ft)	Stack Egress Parameters			
	UTMx (m)	UTMy (m)		Height (ft)	Temp. (°F)	Exit Velocity (M/s)	Diameter (m)
CYCLONE 1	549,345	4,828,343	2,607	42	68	8.09	0.6096
CYCLONE 2	549,345	4,828,345	2,607	50	68	22.86	0.6279
CYCLONE 3	549,345	4,828,348	2,607	44	68	16.17	0.6096
CYCLONE 4	549,345	4,828,352	2,607	44	68	16.17	0.6096

Note: Permit condition requires Classic Kitchen Doors to modify the cyclone stacks to discharge vertically unobstructed instead of horizontal vents or rain caps.

Stack heights, buildings, and other structures were included in the analysis because building downwash of released emissions may influence the plumes (which will tend to bring the plume closer to the ground near the structures). The buildings used in the downwash calculations were the old production shop, new shop addition, maintenance shop, storage shed, and the sawdust collection bins. The elevation and location of each building was used in the U.S. EPA's Building Profile Input Program-PRIME (95086) to calculate the building downwash parameters.

The ambient air boundary for this project includes the areas within the property boundary because public access to the site is not restricted by a fence. All calculations of dispersion modeling impacts occurred outside and inside the property boundary.

Five sets of Cartesian grids at various spacing were arranged around the facility. Two coarse grids were spaced at 500m and 300m. The 500m grid extended out to 5,000m from the site, while the 300m grid extended out to 2,500m from the site. Three fine grids (100m spacing out to 1,000m; 50m spacing out to 250m; 25m spacing out to 100m) were also placed around the site. In addition to these grids, receptors were also placed at 10-15m intervals within the property boundary. A total of 1,440 receptors were used.

The elevations of each receptor were derived from 30m resolution Digital Elevation Model (DEM) 7.5-minute quadrangle maps for the area. The Idaho maps that were used in the analysis include Meridian, Star, Eagle, and Cloverdale.

Five years of meteorological data were used to evaluate the NAAQS concentrations. The closest meteorological station to the site is about 15 miles to the east in Boise, Idaho. Five full years of meteorology (1987-1991) was collected at the National Weather Service's (NWS) Boise Air Terminal meteorological site. It collects both surface and upper air data. The data was taken from EPA's SCRAM website.

3. MODELING RESULTS FOR CRITERIA POLLUTANTS:

Reducing stack exit velocities and stack diameter to account for horizontal release and rain caps resulted in very high PM₁₀ concentrations. Without permit conditions on release configuration, the modeling results showed a first high 24-hour PM₁₀ concentration for all sources of 486µg/m³ and a sixth high of 412µg/m³. Annual PM₁₀ concentrations were 135µg/m³ for all sources.

The modeling results with permit conditions on release configuration showed much lower results. This set of runs treated all the stacks as being vertical. Rather than reducing stack exit velocities and stack diameters, the actual velocities and heights shown in Table 5 were used. These results are summarized in Table 6 and show that the ambient air impacts from these stacks is below NAAQS for PM₁₀.

Table 6. NAAQS Impact Analysis Summary for Classic Kitchen Doors Permitting Project

Pollutant	Averaging Period	Total Ambient Impact ($\mu\text{g}/\text{m}^3$)	Ambient Background Concentration ($\mu\text{g}/\text{m}^3$)	Total NAAQS Concentration ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)	Percent of NAAQS (%)
Without Permit Conditions						
PM ₁₀	24-hour ^a	412	90	502	150	335%
PM ₁₀	annual	135	28.5	163.5	50	327%
With Permit Conditions (Unobstructed Vertical Discharge)						
PM ₁₀	24-hour ^a	50	90	140	150	93%
PM ₁₀	annual	14	28.5	42.5	50	85%

^a Refers to the sixth highest concentration at the same receptor over 5 years (1987-1991).

A summary of one ISC-PRIME model run is attached. It summarizes the output of annual and 24-hour concentrations calculated for PM₁₀ in meteorological year 1987 with permit conditions.

4. REFERENCES:

Idaho Department of Environmental Quality, 2002. *State of Idaho Air Quality Modeling Guideline*, Boise, Idaho, May.

U.S. EPA, 2001. 40CFR51 – *Requirements for Preparation, Adoption, and Submittal of State Implementation Plans (Guideline on Air Quality Models)*.

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**MODELOPTs: CONC

RURAL ELEV DEFAULT

*** THE SUMMARY OF MAXIMUM PERIOD (8760 HRS) RESULTS ***

** CONC OF PM₁₀ IN MICROGRAMS/M**3 **

GROUP ID		AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZFLAG)				OF TYPE	NETWORK GRID-ID
ALL	1ST HIGHEST VALUE IS	12.50067 AT (549225.00,	4828425.00,	793.50,	0.00)	DC	NA
	2ND HIGHEST VALUE IS	11.71903 AT (549425.00,	4828275.00,	795.50,	0.00)	DC	NA
	3RD HIGHEST VALUE IS	11.69216 AT (549200.00,	4828425.00,	793.30,	0.00)	DC	NA
	4TH HIGHEST VALUE IS	11.44837 AT (549450.00,	4828275.00,	795.50,	0.00)	DC	NA
	5TH HIGHEST VALUE IS	11.41962 AT (549250.00,	4828400.00,	793.60,	0.00)	DC	NA
	6TH HIGHEST VALUE IS	11.35859 AT (549200.00,	4828450.00,	793.30,	0.00)	DC	NA
CYCLONE1	1ST HIGHEST VALUE IS	4.04924 AT (549400.00,	4828300.00,	795.30,	0.00)	DC	NA
	2ND HIGHEST VALUE IS	3.73821 AT (549250.00,	4828400.00,	793.60,	0.00)	DC	NA
	3RD HIGHEST VALUE IS	3.29669 AT (549225.00,	4828425.00,	793.50,	0.00)	DC	NA
	4TH HIGHEST VALUE IS	3.26664 AT (549275.00,	4828400.00,	793.80,	0.00)	DC	NA
	5TH HIGHEST VALUE IS	3.23579 AT (549400.00,	4828275.00,	795.30,	0.00)	DC	NA
	6TH HIGHEST VALUE IS	3.20237 AT (549425.00,	4828275.00,	795.50,	0.00)	DC	NA
CYCLONE2	1ST HIGHEST VALUE IS	2.30307 AT (549475.00,	4828250.00,	795.40,	0.00)	DC	NA
	2ND HIGHEST VALUE IS	2.21345 AT (549450.00,	4828250.00,	795.40,	0.00)	DC	NA
	3RD HIGHEST VALUE IS	2.20498 AT (549500.00,	4828250.00,	795.40,	0.00)	DC	NA
	4TH HIGHEST VALUE IS	2.18692 AT (549450.00,	4828275.00,	795.50,	0.00)	DC	NA
	5TH HIGHEST VALUE IS	2.14588 AT (549475.00,	4828225.00,	795.20,	0.00)	DC	NA
	6TH HIGHEST VALUE IS	2.11431 AT (549475.00,	4828275.00,	795.50,	0.00)	DC	NA
CYCLONE3	1ST HIGHEST VALUE IS	3.72966 AT (549225.00,	4828425.00,	793.50,	0.00)	DC	NA
	2ND HIGHEST VALUE IS	3.52220 AT (549425.00,	4828275.00,	795.50,	0.00)	DC	NA
	3RD HIGHEST VALUE IS	3.47697 AT (549200.00,	4828425.00,	793.30,	0.00)	DC	NA
	4TH HIGHEST VALUE IS	3.43992 AT (549450.00,	4828275.00,	795.50,	0.00)	DC	NA
	5TH HIGHEST VALUE IS	3.40567 AT (549425.00,	4828300.00,	795.40,	0.00)	DC	NA
	6TH HIGHEST VALUE IS	3.38127 AT (549200.00,	4828450.00,	793.30,	0.00)	DC	NA
CYCLONE4	1ST HIGHEST VALUE IS	3.86574 AT (549225.00,	4828425.00,	793.50,	0.00)	DC	NA
	2ND HIGHEST VALUE IS	3.57664 AT (549200.00,	4828450.00,	793.30,	0.00)	DC	NA
	3RD HIGHEST VALUE IS	3.45898 AT (549250.00,	4828425.00,	793.70,	0.00)	DC	NA
	4TH HIGHEST VALUE IS	3.33583 AT (549200.00,	4828425.00,	793.30,	0.00)	DC	NA
	5TH HIGHEST VALUE IS	3.32169 AT (549175.00,	4828450.00,	793.10,	0.00)	DC	NA
	6TH HIGHEST VALUE IS	3.26723 AT (549250.00,	4828400.00,	793.60,	0.00)	DC	NA

*** RECEPTOR TYPES: GC = GRIDCART
GP = GRIDPOLR
DC = DISCCART
DP = DISCPOLR
BD = BOUNDARY

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 **MODELOPTs: CONC

RURAL ELEV DFAULT

*** THE SUMMARY OF HIGHEST 24-HR RESULTS ***

** CONC OF PM_10 IN MICROGRAMS/M**3 **

NETWORK GROUP ID GRID-ID			DATE		RECEPTOR (XR, YR, ZELEV, ZFLAG)			OF TYPE
			AVERAGE CONC	(YYMMDDHH)				
ALL	HIGH	1ST HIGH VALUE IS	56.83823	ON 87120324:	AT (549250.00,	4828400.00,	793.60,	0.00) DC
NA								
NA	HIGH	2ND HIGH VALUE IS	56.68645	ON 87120924:	AT (549250.00,	4828400.00,	793.60,	0.00) DC
NA								
NA	HIGH	6TH HIGH VALUE IS	45.30123c	ON 87082324:	AT (549450.00,	4828275.00,	795.50,	0.00) DC
CYCLONE1	HIGH	1ST HIGH VALUE IS	18.91415	ON 87031524:	AT (549400.00,	4828300.00,	795.30,	0.00) DC
NA								
NA	HIGH	2ND HIGH VALUE IS	17.41116	ON 87120924:	AT (549325.56,	4828356.50,	794.30,	0.00) DC
NA								
NA	HIGH	6TH HIGH VALUE IS	13.85596c	ON 87082324:	AT (549400.00,	4828300.00,	795.30,	0.00) DC
CYCLONE2	HIGH	1ST HIGH VALUE IS	12.70222c	ON 87090324:	AT (549475.00,	4828275.00,	795.50,	0.00) DC
NA								
NA	HIGH	2ND HIGH VALUE IS	11.31875c	ON 87112524:	AT (549475.00,	4828250.00,	795.40,	0.00) DC
NA								
NA	HIGH	6TH HIGH VALUE IS	9.89914c	ON 87082424:	AT (549450.00,	4828275.00,	795.50,	0.00) DC
CYCLONE3	HIGH	1ST HIGH VALUE IS	18.35366	ON 87120324:	AT (549250.00,	4828400.00,	793.60,	0.00) DC
NA								
NA	HIGH	2ND HIGH VALUE IS	18.24490	ON 87120924:	AT (549250.00,	4828400.00,	793.60,	0.00) DC
NA								
NA	HIGH	6TH HIGH VALUE IS	15.23600	ON 87051924:	AT (549425.00,	4828300.00,	795.40,	0.00) DC
CYCLONE4	HIGH	1ST HIGH VALUE IS	19.38445	ON 87120324:	AT (549275.00,	4828400.00,	793.80,	0.00) DC
NA								
NA	HIGH	2ND HIGH VALUE IS	18.05410	ON 87030424:	AT (549250.00,	4828400.00,	793.60,	0.00) DC
NA								
NA	HIGH	6TH HIGH VALUE IS	13.78021c	ON 87121424:	AT (549275.00,	4828400.00,	793.80,	0.00) DC

*** RECEPTOR TYPES: GC = GRIDCART
 GP = GRIDPOLR
 DC = DISCCART
 DP = DISCPOLR
 BD = BOUNDARY

APPENDIX C

Response to Public Comments

March 28, 2003

**STATE OF IDAHO
DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PUBLIC COMMENTS
ON PROPOSED TIER II AIR QUALITY
FOR COMPANY NAME**

Introduction

As required by IDAPA 58.01.01.404.01.c (*Rules for the Control of Air Pollution in Idaho*), the Idaho Department of Environmental Quality (DEQ) provided for public comment, including offering an opportunity for a hearing, on the Tier II permit proposed for Classic Kitchen Doors located in Meridian, Idaho. Public comment packages, which included the application materials, and proposed permit and technical memorandum, were made available for public review and was also posted on DEQ's Web site. The public comment period was provided from January 31, 2003 to March 3, 2003. There were no requests for a public hearing. Those comments regarding the air quality aspects of the proposed permit are provided below with DEQ's response immediately following.

The only document submitted during the public comment period was from Classic Kitchen Doors.

Public Comments and DEQ Responses

Comment 1: Classic Kitchen Doors requested to include annual hours of operation limits on the cyclone operations to reduce potential PM₁₀ emissions. The proposed permit allowed all four cyclones to operate 8,760 hours per year. Classic Kitchen requested the limits to be reduced to 4,160 hours per year.

DEQ Response to Comment 1:

Request granted.