



**Air Quality Permitting
Statement of Basis**

August 17, 2006

**Tier II Operating Permit
No. T2-060001**

Tree Top Recycling, Inc., Boise

Facility ID No. 777-00385

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FINAL PERMIT

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	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
km	kilometer
NAAQS	National Ambient Air Quality Standards
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₃	ozone
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
PTE	Potential to Emit
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
T/yr	Tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this document is to satisfy the requirements of IDAPA 58.01.01.400 through 410, Rules for the Control of Air Pollution in Idaho (Rules), for issuing Tier II operating permits (Tier II).

2. FACILITY DESCRIPTION

Tree Top Recycling, Inc. recycles wood materials for use in agricultural and horticultural applications. Materials accepted for processing include all types of organic materials and wood products, such as pallets, trees, and shrub refuse. Material received at the facility is staged in a receiving process area. A loader then feeds the material into a horizontal feed grinder. The ground material is then loaded into heavy trucks and transported offsite for use in agricultural and horticultural applications or stored for later transport. All portable equipment is powered with diesel fuel.

3. FACILITY / AREA CLASSIFICATION

Tree Top Recycling, Inc. is classified as a minor facility because Tree Top Recycling, Inc.'s potential to emit is less than major source thresholds without requiring limits on its potential to emit. The AIRS classification is "B".

The facility is located within AQCR 64 and UTM zone 11. The facility is located in Ada County, which is designated attainment for PM₁₀ and CO, and unclassifiable for all regulated criteria pollutants (NO_x, SO₂, lead, and ozone).

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at Tree Top Recycling, Inc. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

This project is being done by request of the Boise Regional Office in response to historical fugitive dust complaints at this facility location. Tree Top Recycling, Inc. is a new owner at this location and is using a new facility process with different equipment.

4.1 *Application Chronology*

August 2, 2005	Tree Top Recycling, Inc. purchased Castle Wood Products location (Permit No. 001-00129).
January 4, 2006	DEQ received notification of purchase and request for permit from Tree Top Recycling, Inc.
January 12, 2006	Complaint investigation performed by DEQ Boise Regional Office at Tree Top Recycling, Inc.
February 14, 2006	DEQ sent information request to Tree Top Recycling, Inc.
February 21, 2006	DEQ received response to information request from Tree Top Recycling, Inc.
May 22, 2006	DEQ issued completeness letter to Tree Top Recycling, Inc.
July 21, 2006	DEQ provided draft for facility and regional office review.
July 21, 2006	Tom Krinke of the Boise Regional Office provided comments by email.
August 11, 2006	Devin Downs of Tree Top Recycling, Inc. was contacted by phone to verify that he had no comments upon review.

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this Tier II.

5.1 Equipment Listing

All equipment at Tree Top Recycling, Inc., that has the potential to create fugitive dust.

5.2 Emissions Inventory

All regulated emissions at this facility are fugitive dust emissions.

5.3 Modeling

No modeling was necessary to demonstrate compliance with the NAAQS because fugitive dust Best Management Practices assure compliance with the PM₁₀ NAAQS to the satisfaction of the DEQ.

5.4 Regulatory Review

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

IDAPA 58.01.01.401 Tier II Operating Permit

This Tier II permit is being issued in accordance with IDAPA 58.01.01.401.03 to specify operating requirements necessary to ensure compliance with air quality standards.

IDAPA 58.01.01.404 Procedure For Issuing Permits

The procedures for revision, issuance, and approval apply to this permit.

40 CFR 60 New Source Performance Standards (NSPS)

No equipment associated with this modification is affected by any NSPS standards.

5.5 Fee Review

In accordance with IDAPA 58.01.01.407.01, fee calculation shall not include fugitive emissions. In addition, since no facility specific requirements were developed in this permitting process, the Tier II operating permit processing fee is \$500 (Table 5.1).

Table 5.1 TIER II PROCESSING FEE SUMMARY

Emissions Inventory	
Pollutant	Permitted Emissions
NO _x	0.0
SO ₂	0.0
CO	0.0
PM ₁₀	0.0
VOC	0.0
TAPS/HAPS	0.0
Total:	0.0
Fee Due	\$ 500.00

5.6 Regional Review of Draft Permit

A draft copy of the permit and statement of basis was provided to the Boise Regional Office on June 13, 2006, and July 21, 2006. Comments were received and addressed on June 14, 2006, and July 21, 2006.

5.7 Facility Review of Draft Permit

A draft copy of the permit and statement of basis was provided to Tree Top Recycling, Inc., on July 21, 2006. Tree Top Recycling, Inc.'s responsible official, Devin Downs was contacted by phone and confirmed he had no comments on the draft permit on August 11, 2006.

6. PERMIT CONDITIONS

In accordance with IDAPA 58.01.01.625, Tree Top Recycling, Inc. shall not discharge any visible emissions from any point of emissions for more than three minutes during any hour. Weekly inspections of the facility shall be done to determine compliance with this permit condition.

In accordance with IDAPA 58.01.01.650-651, Tree Top Recycling, Inc. shall use all reasonable precautions to prevent fugitive dust. Best management practices are included as operating conditions to achieve this permit condition. Tree Top Recycling, Inc. shall record all methods used and the frequency of their use. If any fugitive dust complaints are received, Tree Top Recycling, Inc. shall document the complaint and corrective actions taken.

Fuel oil sulfur content is regulated in accordance with IDAPA 58.01.01.728. To demonstrate compliance with this permit condition, Tree Top Recycling, Inc. shall monitor and record the sulfur content for each shipment of fuel oil received.

All open burning done at Tree Top Recycling, Inc. shall be done in accordance with IDAPA 58.01.01.600-616.

In accordance with IDAPA 58.01.01.775-776, Tree Top Recycling, Inc. shall not cause odors. If any odor complaints are received, Tree Top Recycling, Inc. shall document the complaints and corrective actions taken.

Excess emissions events shall be handled in accordance with IDAPA 58.01.01.130-136.

All records shall be maintained on site for five years and be made available to DEQ representatives upon request.

7. PUBLIC COMMENT

A public comment period on the proposed Tier II operating permit and application materials is not required, because this permitting action does not meet the definition of a facility that requires an opportunity for public comment as found in IDAPA 58.01.01.404.01.c.

8. RECOMMENDATION

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue a final Tier II operating permit to Tree Top Recycling, Inc. In accordance with IDAPA 58.01.01.404.01.c, an opportunity for public comment on the air quality aspects of the proposed permit is not required.

Appendix A

AIRS Information

T2-060001

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

Facility Name: Tree Top Recycling, Inc.
Facility Location: Portable
AIRS Number: 777-00385

AIR PROGRAM								AREA CLASSIFICATION
POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	A-Attainment U-Unclassified N- Nonattainment
SO ₂	B							U
NO _x	B							U
CO	B							A
PM ₁₀	B							A
PT (Particulate)	B							U
VOC	B							U
THAP (Total HAPs)	B							U
			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 at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold but that 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).