



**Air Quality Permitting
Statement of Basis**

October 27, 2004

Permit to Construct No. P-040414

Boise Packaging and Newsprint, L.L.C., Burley

Facility ID No. 031 - 00019

Prepared by:

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AIR QUALITY DIVISION**

FINAL PERMIT

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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
MACT	Maximum Achievable Control Technology
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/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

Boise Packaging and Newsprint, L.L.C. (BPN) manufactures corrugated container products from corrugate paper stock.

3. FACILITY / AREA CLASSIFICATION

The facility is defined as a minor facility because, without permit limits on the potential to emit, emissions of criteria pollutants (CO, NO_x, SO₂, lead, and ozone) do not exceed 100 tons per year. The AIRS classification is "B" because the potential to emit of criteria pollutants is below major source levels.

The facility is located within AQCR 63 and UTM zone 12. The facility is located in Cassia County which is designated as attainment or unclassifiable for all criteria pollutants.

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

4. APPLICATION SCOPE

The facility has requested a name change and change in ownership from Boise Cascade Corporation to Boise Packaging and Newsprint, L.L.C.

4.1 *Application Chronology*

October 5, 2004 DEQ received application.

5. PERMIT ANALYSIS

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

5.1 *Equipment Listing*

No equipment changes are associated with this permitting action.

5.2 *Emissions Inventory*

There is not an increase emissions associated with this permitting action. Therefore, an emissions inventory is not required.

5.3 *Modeling*

A modeling analysis is not required for this permitting action because there is not an increase in emissions.

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 to Permits to Construct

This rule establishes the requirements for permit revisions. Because emissions are not increasing, a public comment period is not required.

5.5 Fee Review

A PTC processing fee is not required for a facility name change/change of ownership.

6. PERMIT CONDITIONS

No changes in permit conditions are associated with the permitting action.

7. PUBLIC COMMENT

The change in name and ownership does not require a public comment period

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that BPN be issued a final PTC No. 040414 for the change in name and ownership of the facility. No public comment period is required, no entity has requested a comment period, and the project does not involve PSD requirements.

ABC/sd

Permit No. P-040032

APPENDIX A

AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

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

Facility Name: Boise Packaging and Newsprint, L.L.C.
Facility Location: Burley
AIRS Number: 031-00019

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	B							U
NO _x	B							U
CO	B							U
PM ₁₀	B							U
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 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).