



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor  
Toni Hardesty, Director

April 28, 2008

**Certified Mail No. 7190 0596 0014 0000 2710**

Tom McCorkle, President  
Boise Moulding and Lumber Company, Inc.  
116 E. 44<sup>th</sup> St.  
Garden City, ID 83714

RE: Facility ID No. 001-00130, Boise Moulding and Lumber Company, Inc., Garden City  
Final Permit Letter

Dear Mr. McCorkle:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-050036 to Boise Moulding and Lumber Company, Inc. for the wood products facility at 116 E. 44<sup>th</sup> St. in Garden City, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on June 12, 2005. This permit is effective immediately. This permit does not release Boise Moulding and Lumber Company, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard, Boise, ID 83706, Phone (208) 373-0550 or Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, Air Quality Compliance Officer, at (208) 373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition

Boise Moulding and Lumber, Garden City  
April 28, 2008  
Page 2

for a contested case, I encourage you to contact Valerie Greear at (208) 373-0550 or [valerie.greear@deq.idaho.gov](mailto:valerie.greear@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is fluid and cursive, with the first name "Mike" and last name "Simon" clearly distinguishable.

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MSVG\hp

Project No. P-050036

Enclosures

Boise Moulding and Lumber, Garden City  
April 28, 2008  
Page 3

HARD COPY TO FACILITY

en: Tom Krinke, Boise Regional Office  
Valerie Greear, Permit Writer  
Marilyn Seymore/ Pat Rayne, AQ Division  
Stationary Source Administrative Assistant

en-web: Laurie Kral, U.S. EPA Region 10

ec: Tom McCorkle, [boisemoulding@usa.net](mailto:boisemoulding@usa.net)

c: Reading File (Ltr Only)  
Source File  
Permit Binder  
Bill Rogers, Permit Coordinator (Ltr Only)  
Phyllis Heitman, AQ Division (Ltr Only)



## Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....	3
1. PERMIT TO CONSTRUCT SCOPE.....	4
2. CYCLONE NO. 1 .....	5
3. CYCLONE NOS. 2 & 3 .....	6
4. LOADOUT BIN.....	8
5. PERMIT TO CONSTRUCT GENERAL PROVISIONS.....	9

## 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
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
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
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
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
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

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050036**

**Permittee:** Boise Moulding & Lumber Co. Inc.  
**Location:** Garden City, Idaho

**Facility ID No. 001-00130**

**1. PERMIT TO CONSTRUCT SCOPE**

**Purpose**

- 1.1 This permit is to bring this facility into compliance with NAAQS.
- 1.2 This PTC replaces Tier II Operating Permit No. T2-990163, issued on June 12, 2000, the terms and conditions of which no longer apply.

**Regulated Sources**

Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

Permit Section	Source Description	Emissions Control(s)
2	<u>Cyclone No. 1</u> Stack Type: Downward Exit diameter: 2.5 ft, Body diameter: 7 ft. Exit height: 43 ft above ground level Operating temperature: Ambient Exhaust flow rate: 9000 acfm Blower power: 40 hp Flow Source: Rip Saw, Resaw, Single Surfacer, Moulder, Straight Line Edger	None
2	<u>Cyclone No. 2</u> Operating temperature: Ambient Body diameter: 8.75 ft. Blower power: 60 hp Flow Source: Two Moulders, Four Sided Planer	Baghouse Stack Type: Horizontal Exit height: 27 ft above ground level
2	<u>Cyclone No. 3</u> Operating Temperature: Ambient Body diameter: 8 ft. Blower power: 60 hp Flow Source: Belt Sander	
3	<u>Truck Loadout Bin</u> Type: Raised Clam Shell Loadout Exit Height: 15 ft Exit Area: 4 ft by 10 ft	Partial Enclosure

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050036**

<b>Permittee:</b>	Boise Moulding & Lumber Co. Inc.	<b>Facility ID No. 001-00130</b>
<b>Location:</b>	Garden City, Idaho	

**2. CYCLONE NO. 1**

**2.1 Process Description**

Cyclone No. 1 is a high efficiency cyclone that collects wood dust and chips from moulders, sanders, and/or other wood processes (see Table 1.1). The wood byproduct is then pneumatically conveyed to a truck loadout bin.

**2.2 Emissions Control Description**

The cyclone functions primarily as process equipment that separates wood byproducts from the air stream and to some extent as an air control device through which the wood byproducts are pneumatically transferred to the loadout bin.

**Table 2.1 CYCLONE DESCRIPTION**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
Cyclone No. 1	None	Cyclone No. 1 Stack

***Emissions Limits***

**2.3 Emissions Limits**

The PM<sub>10</sub> emissions from the cyclone stack shall not exceed 0.88 lb/hr and 1.93 T/yr.

**2.4 Opacity Limit**

Emissions from the Cyclone No. 1 stack, or any other stack, vent, or functionally equivalent opening associated with the millwork, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

***Operating Requirements***

**2.5 Operating Hour Limits**

The operation hours of each cyclone shall not exceed 12 hours per day.

***Monitoring and Recordkeeping Requirements***

**2.6 Operating Hours Monitoring**

The hours of operation of the fans associated with each cyclone shall be monitored and recorded once per day. These records shall be maintained in accordance with General Provision 7.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050036**

<b>Permittee:</b>	Boise Moulding & Lumber Co. Inc.	<b>Facility ID No. 001-00130</b>
<b>Location:</b>	Garden City, Idaho	

**3. CYCLONES NO. 2 & 3**

**3.1 Process Description**

Cyclones No. 2 and 3 are rated high efficiency and will exhaust to a baghouse. The cyclones collect wood dust and chips from moulders, sanders, and/or other wood processes (see Table 1.1). The wood byproduct is then pneumatically conveyed to a truck loadout bin.

**3.2 Emissions Control Description**

The cyclones function primarily as process equipment that separate the wood byproducts from the air stream, which are then transferred pneumatically to the loadout bin. The cyclones exhaust to the baghouse, and all wood byproduct collected there is recycled through the cyclone.

**Table 3.1 CYCLONES DESCRIPTION**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
Cyclone No. 2	Baghouse	Baghouse Stack
Cyclone No. 3		

***Emissions Limits***

**3.3 Emissions Limits**

The PM<sub>10</sub> emissions from the baghouse stack shall not exceed 0.17 lb/hr and 0.75 T/yr.

**3.4 Opacity Limit**

Emissions from the Cyclone No. 1 stack, the baghouse stack, or any other stack, vent, or functionally equivalent opening associated with the millwork, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

***Operating Requirements***

**3.5 Operating Hour Limits**

The hours of operation of each cyclone shall not exceed 12 hours per day.

**3.6 Baghouse**

A baghouse shall be installed and operational within one year of the permit issuance date. The baghouse shall be used at all times during cyclone operation.

**3.7 O&M Manual for Baghouse**

The permittee shall develop an O&M manual for the baghouse that contains, at a minimum, the manufacturer recommendations for proper baghouse upkeep, the procedure for bag replacement, and the acceptable operating pressure drop range. The O&M manual shall be prepared prior to the operation of the baghouse and shall be kept onsite and available at all times.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050036**

<b>Permittee:</b>	Boise Moulding & Lumber Co. Inc.	<b>Facility ID No. 001-00130</b>
<b>Location:</b>	Garden City, Idaho	

**3.8 Baghouse Pressure Drop**

The baghouse shall be operated within the pressure differential range recommended by the manufacturer, and listed in the O&M manual required by Permit Condition 3.7.

***Monitoring and Recordkeeping Requirements***

**3.9 Operating Hours Monitoring**

The hours of operation of the fans associated with each cyclone shall be monitored and recorded once per day. These records shall be maintained in accordance with General Provision 7.

**3.10 Pressure Drop Monitoring**

The pressure differential across the baghouse shall be monitored and recorded once per day. These records shall be maintained in accordance with General Provision 7.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050036**

**Permittee:** Boise Moulding & Lumber Co. Inc.  
**Location:** Garden City, Idaho

**Facility ID No. 001-00130**

**4. LOADOUT BIN**

**4.1 Process Description**

Wood byproducts generated during millwork consist of sawdust, chips, and shavings. These byproducts are conveyed pneumatically from the buildings to the cyclones and then to the loadout bin. The byproduct is then dropped into a truck trailer.

**4.2 Emissions Control Description**

Wood byproduct is separated from the air stream in the cyclones and is then pneumatically transferred to the loadout bin. The wood byproduct is then dumped through the clam shell opening to a truck trailer below and hauled offsite. The area under the loadout bin is enclosed on two sides to reduce fugitive dust.

**Table 4.1 LOADOUT BIN DESCRIPTION**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
Loadout Bin	Partial Enclosure	Openings on either end of loadout bay

***Emissions Limits***

**4.3 Opacity Limit**

Emissions from the loadout bin shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

***Operating Requirements***

**4.4 Wood Byproduct Loadout Limits**

The amount of wood byproduct unloaded into trucks through the loadout bin shall not exceed 5 tons per day, based on an average daily rate per calendar month to demonstrate compliance with NAAQS.

**4.5 Wood Byproduct Loadout Bin O&M Manual**

The permittee shall develop an O&M manual within 6 months of permit issuance for the wood byproduct loadout bin. The O&M manual shall explain how the bin will be operated and maintained to minimize dust emissions leaving the property. At a minimum, the manual shall include specific methods for minimizing the amount of dust created while unloading the bin. The O&M manual shall be kept onsite and available at all times.

***Monitoring and Recordkeeping Requirements***

**4.6 Throughput Monitoring**

The mass (tons) and date of wood byproduct loaded into trucks during each unloading event shall be monitored and recorded. These records shall be maintained in accordance with General Provision 7.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050036**

<b>Permittee:</b>	Boise Moulding & Lumber Co. Inc.	<b>Facility ID No. 001-00130</b>
<b>Location:</b>	Garden City, Idaho	

**5. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

***General Compliance***

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

**[Idaho Code §39-101, et seq.]**
  
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

**[IDAPA 58.01.01.211, 5/1/94]**
  
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

**[IDAPA 58.01.01.212.01, 5/1/94]**

***Inspection and Entry***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

**[Idaho Code §39-108]**

***Construction and Operation Notification***

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
  - a. A notification of the date of initiation of construction, within five working days after occurrence;

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050036**

<b>Permittee:</b>	Boise Moulding & Lumber Co. Inc.	<b>Facility ID No. 001-00130</b>
<b>Location:</b>	Garden City, Idaho	

- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

**[IDAPA 58.01.01.211, 5/1/94]**

***Performance Testing***

- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

**[IDAPA 58.01.01.157, 4/5/00]**

***Monitoring and Recordkeeping***

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

**[IDAPA 58.01.01.211, 5/1/94]**

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050036**

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***Excess Emissions***

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

**[IDAPA 58.01.01.130-136, 4/5/00]**

***Certification***

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

**[IDAPA 58.01.01.123, 5/1/94]**

***False Statements***

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

**[IDAPA 58.01.01.125, 3/23/98]**

***Tampering***

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

**[IDAPA 58.01.01.126, 3/23/98]**

***Transferability***

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

**[IDAPA 58.01.01.209.06, 4/11/06]**

***Severability***

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

**[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]**