



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

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

February 2, 2012

John Brennan, CSP  
Safety, Security, and Environmental Health Manager  
Kimball Office  
1881 Seltice Way  
Post Falls, ID 83854

RE: Facility ID No. 055-00038, Kimball Office, Post Falls  
Final Permit Letter

Dear Mr. Brennan:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2011.0137, Project 60956 to Kimball Office for the office furniture manufacturing facility located at Post Falls, Idaho. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received November 14, 2011.

This permit is effective immediately and replaces Tier II Operating Permit No. T2-050114, issued on January 23, 2007. This permit does not release Kimball Office from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Air Quality Analyst, at (208) 769-1422 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that 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 for a contested case, I encourage you to contact Ken Hanna at (208) 373-0502 or [kenneth.hanna@deq.idaho.gov](mailto:kenneth.hanna@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".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\KH

Permit No. P-2011.0137 PROJ 60956

Enclosures

**Air Quality**  
**PERMIT TO CONSTRUCT**

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**Permittee** Kimball Office - Post Falls

**Permit Number** P-2011.0137

**Project ID** 60956

**Facility ID** 055-00038

**Facility Location** 1881 Seltice Way  
Post Falls, ID 83854

**Permit Authority**

This permit (a) is issued according to the *Rules for the Control of Air Pollution in Idaho (Rules)*, IDAPA 58.01.01.200-228; (b) pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with its application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (g) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200-228.

**Date Issued** February 2, 2012



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**Ken Hanna, Permit Writer**



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**Mike Simon, Stationary Source Manager**

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## PERMIT SCOPE

### *Purpose*

1. This is a revised permit to construct (PTC) issued to renew an expiring Tier II operating permit/PTC and to change the facility name. Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right hand margin.
2. This PTC replaces Permit to Construct No. T2-050114, issued on January 23, 2007.
3. The emission sources regulated by this permit are listed in the following table.

**Table 1 REGULATED SOURCES**

<b>Sources</b>	<b>Control Equipment</b>
Dry-Off Oven	None
Curing Oven	None
Burn-Off Oven	None
Work Surfaces Contact Adhesive Booth	Filter System
Panels Spray Booth	Filter System

## **FACILITY-WIDE CONDITIONS**

### ***Fugitive Emissions***

- 4.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
  - Application, where practical, of asphalt, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
  - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
  - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
  - Paving of roadways and their maintenance in a clean condition, where practical.
  - Prompt removal of earth or other stored material from streets, where practical.
- 4.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 4.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 4.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive dust emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive dust emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive dust emissions were present (If observed), any corrective action taken in response to the fugitive dust emissions, and the date the corrective action was taken.

### ***Odors***

5. The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution in accordance with IDAPA 58.01.01.775-776.
6. The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

## **Visible Emissions**

7. The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO<sub>x</sub>, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
8. The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:
  - a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).or
  - b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130 136.

## **Open Burning**

9. The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.600-617.

## **Fuel-burning Equipment**

10. The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas in accordance with IDAPA 58.01.01.675.

## **DRY-OFF OVEN**

### 11. **Process Description**

Steel furniture parts go through a washing operation. When the parts exit the last stage of the washer, they are carried by the overhead conveyor through the dry-off oven. This oven is heated with a natural gas burner with a heat-input capacity of 3.5 MMBtu/hr. The burner has one stack: stack 24.

### 12. **Emission Control Description**

Emissions from the dry-off oven are uncontrolled.

### ***Emissions Limits***

#### 13. **Dry-off Oven Burner Stacks 24**

- Nitrogen oxides emissions from the dry-off oven burner stack 24 shall not exceed 0.49 lb/hr.
- Nitrogen oxides emissions from the dry-off oven burner stack 24 shall not exceed 2.15 tons per any consecutive 12-month period.

### ***Operating Requirements***

14. The dry-off oven burners shall be fueled with natural gas exclusively.

## **CURING OVEN**

### **15. Process Description**

After the dry-off oven, the steel furniture parts are powder coated and conveyed to a two-stage curing oven. Curing oven stage 1 and stage 2 each use a 6.0 MMBtu/hr natural gas-fired burner to supply heat to dry the powder coating. A third, 6.0 MMBtu/hr natural gas-fired burner is used as a space heater that provides heat for the curing oven room during the winter months. Curing oven stages 1 and 2 exhaust emissions through stacks 29 and 30, respectively. The curing oven space heater vents emissions through stack 26.

### **16. Emission Control Description**

Emissions from the curing oven are uncontrolled

## ***Emissions Limits***

### **17. Curing Oven Stacks 26, 29, and 30**

- Nitrogen oxides emissions from the curing oven stack 26 shall not exceed 0.74 lb/hr.
- Nitrogen oxides emissions from the curing oven stack 26 shall not exceed 3.26 tons per any consecutive 12-month period.
- Nitrogen oxides emissions from the curing oven stack 29 shall not exceed 0.75 lb/hr.
- Nitrogen oxides emissions from the curing oven stack 29 shall not exceed 3.27 tons per any consecutive 12-month period.
- Nitrogen oxides emissions from the curing oven stack 30 shall not exceed 0.75 lb/hr.
- Nitrogen oxides emissions from the curing oven stack 30 shall not exceed 3.27 tons per any consecutive 12-month period.

## ***Operating Requirements***

18. The curing oven burners and the curing oven room space heater burner shall be fueled exclusively with natural gas.

## **BURN-OFF OVEN**

### 19. **Process Description**

After the parts have been processed through the curing oven, the burn-off oven is used to remove cured powder coating from conveyor part hangers and other powder coating-encrusted steel parts. The oven has a 2.0 MMBtu/hr natural gas-fired burner.

### 20. **Emission Control Description**

Emissions from the burn-off oven are uncontrolled.

## ***Emissions Limits***

### 21. **Burn-off Oven**

- Nitrogen oxides emissions from the burn-off oven stack shall not exceed 0.67 lb/hr.
- Nitrogen oxides emissions from the burn-off oven stack shall not exceed 2.94 tons per any consecutive 12-month period.

## ***Operating Requirements***

22. The burn-off oven burner shall be fueled exclusively with natural gas.
23. The gas-fired burn-off oven shall not be operated at temperatures above 1,400 degrees Fahrenheit.
24. The burn-off oven shall be restricted to 6,000 hooks and powder coating-encrusted parts, combined, processed in a day.
25. The burn-off oven shall be used to thermally clean powder coating, adhesives, and other coatings from powder coating hooks and powder coating-encrusted parts.

## ***Monitoring & Recordkeeping Requirements***

26. The permittee shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement and recording of the burn-off oven chamber temperature. These records shall be maintained in accordance with the General Provisions section of this permit.
  - 26.1 The temperature shall be recorded daily while the burn-off oven is operating at normal capacity.
  - 26.2 The monitoring device must be certified by the manufacturer to be accurate within 1% of the measured value and must be calibrated on an annual basis in accordance with manufacturer instructions.

## FACILITY-WIDE SOLVENT, ADHESIVE, AND OTHER CHEMICAL USE

### 27. Process Description

Various solvents, adhesives and other chemicals are used in the manufacture of work surfaces from particleboard, the application of solvent-based contact adhesive to attach melamine banding material to wood, and the application of veneer to work surfaces.

After metal furniture parts are made and cleaned, they are powder coated. There are four powder coating booths. The parts are then dried in a two-stage curing oven.

Work surfaces are manufactured from particleboard. Thin sheets of laminate are glued to the fiberboard with a spray coat application process and water-base glue. Work surfaces are cut to shape on a panel saw. Sawdust is collected in one baghouse that returns filtered air into the room. Solvent-based contact adhesive is used to glue melamine banding material to the wood, using a spray booth during the glue application. At the Panels spray booth, spray adhesive is also applied to metal frames, onto which metal sheets or insulation are attached.

### 28. Emission Control Description

Table 2 describes the control devices used in controlling emissions from the sources regulated in this permit.

**Table 2 DRY OFF OVEN DESCRIPTION**

Emissions Units / Processes)	Emissions Control Device	Emissions Point
Work Surfaces Contact Adhesive Booth	Filter System	Stack
Panels spray booth	Filter System	Stack

### ***Emissions Limits***

#### 29. Particulate Matter

- Emissions of PM<sub>10</sub> generated from the use of all adhesives, and other chemicals from the facility shall not exceed 1.4 lb/hr.
- Emissions of PM<sub>10</sub> generated from the use of all adhesives, and other chemicals from the facility shall not exceed 6.13 tons per any consecutive 12-month period.

### ***Operating Requirements***

30. The permittee shall install and maintain filter systems to control particulate generated at the work surfaces contact adhesive application process and Panels spray booth. The filter systems shall have a minimum control efficiency of 96%.
31. The filters shall be replaced every 80 hours of operation, or at any other time that a filter becomes damaged or is otherwise unable to meet the minimum control efficiency of 96%.

## **Monitoring and Recordkeeping Requirements**

32. To demonstrate compliance with Permit Condition 31, the permittee shall do the following:
- Maintain records of the “hours of operation” of the filter systems. These records shall be sufficient to demonstrate that the filters are replaced after no more than 80 hours of operation.
  - Record the date and time that each filter is changed.
  - Record reason for the filter change (i.e., routine maintenance or damaged filter).

The records shall be maintained in accordance with the General Provisions section of this permit.

33. The permittee shall maintain monthly records which shall contain, but not be limited to, adhesives or other chemical compounds used at the facility. These records shall be maintained in accordance with the General Provisions section of this permit.
34. The permittee shall monitor and record the monthly hours of facility operation. The monthly hours of operation shall be determined by summing each daily hours of operation for the previous month period. Records of this information shall be maintained in accordance with the General Provisions of this permit.
35. The permittee shall calculate the monthly weighted average solids percent by weight of all adhesives, and other chemicals used at the facility to determine compliance with Permit Condition 29. The permittee shall also calculate the total monthly emissions of PM<sub>10</sub> from adhesives, solvents, and other chemicals used at the facility for the month. The monthly emissions of PM<sub>10</sub> shall be converted to a pounds-per-hour (lb/hr) value by dividing the monthly emission rate by the hours of operation for the facility to determine compliance with the emission limits listed for this permit.

All data and calculations used to determine PM<sub>10</sub> emissions from the facility shall be maintained in accordance with the General Provisions section of this permit.

## GENERAL PROVISIONS

### *General Compliance*

36. 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.]

37. 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]

38. 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*

39. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- 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;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 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*

40. This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

41. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

- 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; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

### ***Performance Testing***

42. 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, at its option, may 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.
43. 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.
44. 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***

45. 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]

### ***Excess Emissions***

46. 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**

47. 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. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Coeur d'Alene Regional Office  
2110 Ironwood Parkway  
Coeur d'Alene, ID 83814  
Phone: (208) 769-1422  
Fax: (208) 769-1404

[IDAPA 58.01.01.123, 5/1/94]

### **False Statements**

48. 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**

49. 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**

50. 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**

51. 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 58.01.01.211, 5/1/94]