



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

November 15, 2004

Certified Mail No. 7000 0520 0016 0850 03281

Doug Pasley
General Manager
Boise Packaging and Newsprint, L.L.C.
1544 W. 27th St.
Burley, ID 83318

RE: Facility ID No. 031-00019, Boise Packaging and Newsprint, L.L.C., Burley
Final Permit Letter

Dear Mr. Pasley:

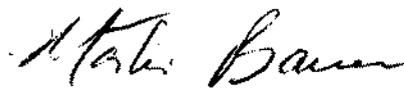
The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-040414 for Boise Packaging and Newsprint, L.L.C. (BPN) in accordance with IDAPA 58.01.01.200 through 228 (*Rules for the Control of Air Pollution in Idaho*). This permit is effective immediately and is based on your request for a change in name and ownership received on October 5, 2004.

This permit does not release BPN from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations 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 call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,


Martin Bauer, Administrator
Air Quality Division

MB/ABC/sd

Permit No. P-040414

Enclosures

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AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040414

Permittee:	Boise Packaging and Newsprint, LLC	Facility ID No. 031-00019	Date Issued:	November 15, 2004
Location:	Burley, Idaho			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

This permit to construct replaces the following permits, the terms and conditions of which no longer apply.

- Permit to Construct No. 031-00019, issued May 16¹⁷, 2002
- Permit to Construct No. 031-00019, issued April 11, 2000
- Permit to Construct No. 031-00019, issued January 26, 1996
- Permit to Construct No. 031-00019, issued April 9, 1991

Regulated Sources

Table 1.1 below lists all sources of emissions that are regulated in this permit to construct.

Table 1.1 EMISSIONS SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Starch silo	Starch silo baghouse
3	Corrugator operations	Enclosed building
4	Scrap collection	Cyclone
5	2 – 12.495 MMBtu/hr [*] Clayton Industrial Boilers	None

*MMBtu/hr – million British thermal units per hour

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2. STARCH SILO

2.1 Process Description

Starch is stored in starch silo.

Emissions Limits

2.2 Particulate Matter

Emissions of particulate matter with a mean aerodynamic diameter of 10 microns or less (PM₁₀) shall not exceed 0.077 pounds per hour (lb/hr) averaged over a 24-hour time period, nor shall they exceed 2.25 tons per any consecutive 12-month period.

2.3 Opacity Limit

Emissions from the starch silo-baghouse stack, or any other stack, vent, or functionally equivalent opening 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

2.4 Throughput Limit

The starch silo throughput shall not exceed 4,380 tons of starch per any consecutive 12-month period.

2.5 Baghouse Pressure Drop

The pressure drop across the baghouse shall be maintained within manufacturer and Operation and Maintenance (O&M) manual specifications. Documentation of the operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.6 Air Pollution Emergency Rules

The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550-562.

Monitoring and Recordkeeping Requirements

2.7 Throughput Monitoring

The permittee shall monitor and record the starch silo throughput once per month. The throughput shall be measured in units of tons. Each month, the permittee shall sum the previous consecutive 12-months throughput to demonstrate compliance with Permit Condition 2.4. A compilation of the most recent two years of records shall be kept on site and shall be made available to DEQ representatives upon request.

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2.8 Baghouse Pressure Drop

The permittee shall install, calibrate, and operate in accordance with manufacturer specifications, pressure drop monitoring equipment to continuously measure the pressure differential across the baghouse. The permittee shall record the pressure drop across the baghouse once on a weekly basis. A compilation of the most recent two years of records shall be kept on site and shall be made available to DEQ representatives upon request.

2.9 Operations and Maintenance Manual Requirements

Within 60 days after issuance of the permit, the permittee shall have developed an O&M Manual for the starch silo baghouse describing the procedures that will be followed to comply with General Provision 2. The manual shall contain, at a minimum, manufacturer operating parameters, methods used to measure the pressure drop, and a maintenance schedule. This manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

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3. CORRUGATOR OPERATIONS

3.1 Process Description

The primary purpose of the corrugator operations is to manufacture corrugated containers. Boise Packaging and Newsprint, LLC (Boise Pkg.) has installed two new single facers as an upgrade to the wet end of the corrugator, increasing its production capacity to 1.8 billion square feet of container sheets per year.

3.2 Control Description

An enclosed building controls PM₁₀ emissions from the corrugator operations.

Emissions Limits

3.3 Particulate Matter

Emissions of PM₁₀ from the corrugator operations shall not exceed 0.075 lb/hr averaged over a 24-hour time period.

Operating Requirements

3.4 Throughput Limits

The maximum annual throughput of container sheets shall not exceed 1.8 billion square feet per any consecutive 12-month period. The maximum daily throughput of container sheets shall not exceed 10.44 million square feet per day.

Monitoring and Recordkeeping Requirements

3.5 Throughput Monitoring

Daily and monthly, the permittee shall monitor and record the throughput of container sheets in units of square feet. Each month, the permittee shall sum the previous consecutive 12-months total throughput to demonstrate compliance with Permit Condition 3.4. A compilation of the most recent two years of records shall be kept on site and shall be made available to DEQ representatives upon request.

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4. SCRAP COLLECTION

4.1 Process Description

The scrap-collection system is used to collect scrap from corrugator operations. Scrap is pneumatically collected from multiple locations and bailed.

Emissions Limits

4.2 PM₁₀ Emissions Limit

Emissions of PM₁₀ from the cyclone shall not exceed 0.945 lb/hr averaged over a 24-hour time period.

Operating Requirements

4.3 Control Equipment

The permittee shall utilize a cyclone to control particulate matter emissions from the pneumatic scrap-collection system at all times the system is in operation.

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5. BOILERS

Emissions Limits

5.1 Emissions Limits

Emissions from the two boilers shall not exceed any corresponding emissions rate limits listed in Table 5.1 below.

Table 5.1 EMISSIONS LIMITS

Source Description	PM ₁₀		NO _x
	lb/hr	T/yr	T/yr
2 - 12.495 MMBtu/hr Clayton Industrial Boilers	0.883	1.12	11.1

Operating Requirements

5.2 Fuel Type

The fuel used in the boilers shall be natural gas or No. 2 diesel fuel only. The use of No. 2 diesel fuel shall not exceed 720 hours, per boiler, per any consecutive 12-month period.

Monitoring Requirements

5.3 Fuel Usage

Once per month, the permittee shall monitor and record the number of hours that No. 2 diesel fuel is used in each boiler. Each month, the permittee shall sum the previous consecutive 12-months total hours No. 2 diesel fuel is used in each boiler to demonstrate compliance with Permit Condition 5.2. A compilation of the most recent two years of records shall be kept on site and shall be made available to DEQ representatives upon request.

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6. PERMIT TO CONSTRUCT GENERAL PROVISIONS

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.

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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. The Director may require the permittee to develop a list of operation and maintenance procedures to be submitted to DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
7. 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.

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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.

8. 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.
9. In accordance with IDAPA 58.01.01.123, 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.