



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

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

June 25, 2008

**Certified Mail No. 7190 0596 0014 0000 3083**

Brian Rehberg, V.P. of Aircraft Services  
Western Aircraft Inc.  
4300 S. Kennedy Street  
Boise, ID 83705

RE: Facility ID No. 001-00220, Western Aircraft Inc., Boise  
Final Permit Letter

Dear Mr. Rehberg:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2008.0013 to Western Aircraft Inc. for the installation of a spray booth and prep station located at Boise, 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 February 12, 2008. This permit is effective immediately. This permit does not release Western Aircraft 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 St, Boise, ID 83706, 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

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for a contested case, I encourage you to contact Almer Casile at (208) 373-0502 or Almer.Casile@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\AC\hp

Project No. P-2008.0013

Enclosures



**Air Quality**  
**PERMIT TO CONSTRUCT**  
 State of Idaho  
 Department of Environmental Quality

**PERMIT No.:** P- 2008.0013  
**FACILITY ID No.:** 001- 00220  
**AQCR:** 64                      **CLASS:** B  
**SIC:** 4581                      **ZONE:** 11  
**UTM COORDINATE (km):** 561.6, 4823.6

**1. PERMITTEE**

Western Aircraft Inc.

**2. PROJECT**

Initial PTC - Installation of Spray Booth and Prep Station

**3. MAILING ADDRESS**

4300 S. Kennedy Street

**CITY**

Boise

**STATE**

ID

**ZIP**

83705

**4. FACILITY CONTACT**

Brian Rehberg

**TITLE**

V.P. of Aircraft Services

**TELEPHONE**

(208)338-1851

**5. RESPONSIBLE OFFICIAL**

Brian Rehberg

**TITLE**

V.P. of Aircraft Services

**TELEPHONE**

(208)338-1851

**6. EXACT PLANT LOCATION**

4300 S. Kennedy Street

**COUNTY**

Ada

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Aircraft refurbishment

**8. PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and 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.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) 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.

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

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

ALMER CASILE, PERMIT WRITER  
 DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
 DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE MODIFIED/REVISED:**

**DATE ISSUED:**

June 25, 2008

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## 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
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
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(s)
m	meter(s)
PM	particulate matter
PTC	permit to construct
SIC	Standard Industrial Classification
SIP	State Implementation Plan
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0013**

<b>Permittee:</b>	Western Aircraft Inc.	<b>Facility ID No.</b> 001- 00220
<b>Location:</b>	Boise, Idaho	

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

- 1.1 This permitting action involves the installation of a spray booth and prep area.
- 1.2 This permit is the initial PTC to the facility.

***Regulated Sources***

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

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control</b>
2	Two (2) Station Spray booth and prep area. Spray guns are associated with each spray station of the spray booth.	Two Stage Filter System. Stage 1 Filter with PM Control Efficiency of 96.5% Stage 2 Filter with PM Control Efficiency of 99.1%  Two Stage Filter System. Stage 1 Filter with PM Control Efficiency of 96.5% Stage 2 Filter with PM Control Efficiency of 99.1%

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**Facility ID No. 001- 00220**

**Location:** Boise, Idaho

**2. SPRAY BOOTH AND PREP AREA**

**2.1 Process Description**

The spray booth and prep area are used for the refinishing of cabinets and recovering of walls and headliners. The spray booth consists of work stations. The two spray guns are used in the spray booth to apply clearcoat, hardeners, and adhesives. One spray applies clearcoat and hardeners, and the other applies adhesives.

**2.2 Emissions Control Description**

**Table 2.1 SPRAY BOOTH DESCRIPTION**

Emissions Unit / Process	Emissions Control Device	Emissions Point
Spray Booth	Two Stage Filter System. Stage 1 Filter with PM Control Efficiency of 96.5% Stage 2 Filter with PM Control Efficiency of 99.1%	Stack 1
	Two Stage Filter System. Stage 1 Filter with PM Control Efficiency of 96.5% Stage 2 Filter with PM Control Efficiency of 99.1%	Stack 2

***Emissions Limits***

**2.3 Emissions Limits**

- Volatile Organic Compound (VOC) emissions from the spray booths shall not exceed 6.72 tons during any consecutive 12-calendar month period.
- Emissions of any single Hazardous Air Pollutant (HAP) from the entire facility shall not equal or exceed 3.09 tons per any consecutive 12-calendar month period.
- Emissions of any combination of HAPs from the entire facility shall not equal or exceed 3.38 tons per any consecutive 12-calendar month period.

**2.4 Opacity Limit**

Emissions from the spray booths , or any other stack, vent, or functionally equivalent opening associated with the spray booth and prep area operation, 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.

**2.5 Odor Emissions**

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776.

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**Permittee:** Western Aircraft Inc.

**Location:** Boise, Idaho

**Facility ID No. 001- 00220**

***Operating Requirements***

**2.6 Hours of Operation**

Total hours of operation of the spray guns shall not exceed 654 hours per any consecutive 12-calendar month period.

**2.7 Spray Gun Usage**

The permittee shall only operate one (1) spray gun at a time.

**2.8 Material Usage**

The permittee shall maintain materials usage records of the amount of material applied by each spray gun.

**2.9 Material Purchase Records**

The permittee shall maintain material purchase records of all materials that contain, but are not limited to, the following information:

- the name and identification number for each solvent and ink used; and
- gallons and pounds of solvents and inks used.

**2.10 Manufacturer Data Sheets & MSDSs**

The permittee shall maintain the manufacture formulation data sheets or material safety data sheets for the materials used in the spray booth and prep area that contain toxic air pollutants (TAPs), HAPs and VOCs purchased pursuant to permit condition 2.8.

**2.11 Spray Booth Filter System**

The permittee shall install, maintain, and operate, according to manufacturer's and O&M manual recommendations and specifications, filters with a minimum removal efficiency of 99% for particulates for the paint booths.

***Monitoring and Recordkeeping Requirements***

**2.12 HAP Recordkeeping Requirements**

The permittee shall collect and maintain records of the following:

- The permittee shall monitor and record the monthly and annual emissions of any combination HAP using the material usage records required by Permit Condition 2.8, the material purchase records required by Permit Condition 2.9, and the manufacturer and MSDS records required by Permit Condition 2.10 to demonstrate compliance with Permit Condition 2.3. The annual emissions of any combination of HAPs shall be determined by summing monthly the total combination of HAP emissions over the previous consecutive 12-month period.
- The permittee shall monitor and record the monthly and annual emissions of any individual HAP using the material usage records required by Permit Condition 2.8, the material purchase records required by Permit Condition 2.9, and the manufacturer and MSDS records required by Permit Condition 2.10 to demonstrate compliance with Permit Condition 2.3. The annual emissions of any individual of HAPs shall be determined by summing the monthly emissions of each of HAP over the previous consecutive 12-month period.

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**Permittee:** Western Aircraft Inc.

**Location:** Boise, Idaho

**Facility ID No. 001- 00220**

**2.13 VOC Recordkeeping Requirements**

The permittee shall monitor and record the monthly and annual emissions of VOCs using the material usage records required by Permit Condition 2.8, the material purchase records required by Permit Condition 2.9, and the manufacturer and MSDS records required by Permit Condition 2.10 to demonstrate compliance with Permit Condition 2.3. The annual emissions of VOCs shall be determined by summing monthly the total combination of HAP emissions over the previous consecutive 12-month period.

**2.14 Operations and Maintenance Manual Requirements**

Within 60 days of permit issuance, the permittee shall have developed and submitted to DEQ an Operations and Maintenance (O&M) manual for the spray booths' filter systems which describes the procedures to be followed to comply with General Provision 2 of this permit and the manufacturer specifications for the air pollution control device.

The contents of the O&M manual shall be based on the manufacturer's specifications. A copy of the manufacturer's recommendations shall be included with the O&M manual and both shall be made available to DEQ representatives upon request.

The O&M manual shall be submitted to DEQ within 60 days of permit issuance and in accordance with General Provision 9. Any changes to the O&M manual shall be submitted within 15 days of the change. The operation and monitoring requirements specified in the O&M manual are incorporated by reference to this permit and are enforceable permit conditions.

**2.15 Recordkeeping Requirements**

All records shall be maintained in accordance with General Provision 7.

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### **3. 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;
  - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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**Facility ID No. 001- 00220**

- 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]**

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<b>Location:</b>	Boise, Idaho	

***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)]**