



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

January 6, 2017

Charles Ingram
Corporate Health, Safety, & Environmental Manager
Big Tex Trailer Manufacturing, Inc.
950 I-30 East
Mt Pleasant, TX 75455

RE: Facility ID No. 027-00064, Big Tex Trailer Manufacturing, Caldwell
Final Permit Letter

Dear Mr. Ingram:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2010.0071 PROJ 61781 to Big Tex Trailer Manufacturing located at 312 W. Simplot Boulevard in Caldwell for an ownership change and installation of a replacement paint booth and curing oven. 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 September 1, 2016.

This permit is effective immediately and replaces PTC No. P-2010.0071 PROJ 0001, issued on November 9, 2010. This permit does not release Big Tex Trailer Manufacturing from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision 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 Idaho 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ has required a permit handoff meeting to review and discuss the terms and conditions of this permit. Please schedule this meeting with J.R. Fuentes, Title V Source Inspector, at (208) 373-0550. 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 Morrie Lewis at (208) 373-0502 or Morrie.Lewis@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\ML

Permit No. P-2010.0071 PROJ 61781

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Big Tex Trailer Manufacturing
Permit Number P-2010.0071
Project ID 61781
Facility ID 027-00064
Facility Location 312 W. Simplot Blvd.
Caldwell, ID 83605

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 the 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; and (g) in no manner implies or suggests that the Idaho 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 January 6, 2017



Morrie Lewis, Permit Writer



Mike Simon, Stationary Source Manager

Contents

1 Permit Scope..... 3

2 Coating Operations and Combustion Units (Building 4) 5

3 Assembly Operations (Building 6)..... 18

4 General Provisions..... 20

1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) for a replacement paint booth and a curing oven, and a permit transfer due to ownership change at a trailer manufacturing facility. (The replacement Booth # 1 replaces Prime Booth #1 and Paint Booth #1, which have been removed from the facility.)
- 1.2 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.
- 1.3 This PTC replaces Permit to Construct No. P-2010.0071 Project 0001, issued on November 9, 2010.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	<u>Booth # 1 (PB1)</u> Manufacturer: Col-Met or equivalent ^(a) Maximum operation: 420 gal/day and 38,421 gal/yr, or as limited by Paint Booth Emission Limits for all booths	<u>Booth filter system</u> Booth Type: Downdraft Particulate filtration method: Dry filters Manufacturer: Air Flow Technologies Series 64 or equivalent ^(a) PM Control Efficiency: 99.53% or greater <u>Coating spray guns:</u> Manufacturer: Graco or equivalent ^(a) Model: 244401 Umax 85kV or equivalent ^(a) Type: PRO Xs4 AA electrostatic air-assisted spray guns or equivalent ^(a) Transfer Efficiency: 80% or greater
	<u>Booth # 2 (PB2)</u> Manufacturer: Col-Met or equivalent ^(a) Maximum operation: 420 gal/day, 38,421 gal/yr, or as limited by Paint Booth Emission Limits for all booths	
	<u>Booth # 3 (PB3)</u> Manufacturer: Col-Met or equivalent ^(a) Maximum operation: 420 gal/day, 38,421 gal/yr, or as limited by Paint Booth Emission Limits for all booths	
2	<u>Wash Booth Heater #1 (WB-1)</u> Manufacturer: Ambirad or equivalent ^(a) Model: 7AR84 Maximum capacity: 0.18 MMBtu/hr Fuel: natural gas Maximum operation: 52,500,000 scf/yr (facility-wide)	None
2	<u>Wash Booth Heater #2 (WB-2)</u> Manufacturer: Ambirad or equivalent ^(a) Model: 7AR84 Maximum capacity: 0.18 MMBtu/hr Fuel: natural gas Maximum operation: 52,500,000 scf/yr (facility-wide)	None

2	<u>Curing Oven #1 (CO-1)</u> Manufacturer: Col-Met or equivalent ^(a) Model: BCC-16-13-52-P-DT Maximum capacity: 3 MMBtu/hr Fuel: natural gas Date of installation: 2015 Maximum operation: 52,500,000 scf/yr (facility-wide)	None
2	<u>Curing Oven #2 (CO-2)</u> Manufacturer: Col-Met or equivalent ^(a) Model: EH-3540K-V Maximum capacity: 3 MMBtu/hr Fuel: natural gas Maximum operation: 52,500,000 scf/yr (facility-wide)	None
2	<u>Air Makeup Unit (AMU-1)</u> Manufacturer: Col-Met or equivalent ^(a) Model: EH-3540K-V Maximum capacity: 4 MMBtu/hr Fuel: natural gas Date of installation: November 2014 Maximum operation: 52,500,000 scf/yr (facility-wide)	None
3	<u>Plasma Cutter (PC-1)</u> Manufacturer: Hypertherm or equivalent ^(a) Model: 1250 or equivalent ^(a) Maximum operation: 424,500 linear ft/yr	<u>Plasma Cutter (PC-1) Filtration System</u>
3	<u>(8) Handheld Plasma Cutters (PC-2 through PC-9)</u> Manufacturers: Hypertherm, Miller, or equivalent ^(a) Models: 85 Hand Plaz, 105 Hand Plaz, PowerMax 1000 Hand Plaz, or equivalent ^(a) Maximum operation: 1,536,000 linear ft/yr	None
3	<u>(6) Welders (GMAW-1 through GMAW-68)</u> Manufacturers: Lincoln, Miller, or equivalent ^(a) Models: Power Mig 300, Millermatic 211, 350LX, 350P, CP300, CP302, or equivalent ^(a) Maximum operation: 600,000 lb electrode/yr	None
3	<u>(16) Grinders (MG-1 through MG-16)</u> Manufacturers: Dewalt, Makita, or equivalent ^(a) Models: DWE402, 9557PB, GA7911, or equivalent ^(a) Maximum operation: 300,000 lb grinding wheel materials/yr	None

(a) "or equivalent" equipment is equipment which has equivalent or less maximum capacity and equivalent or lower pollutant emission rates, whether calculated based on maximum design capacity or based on established permit limits. Use of replacement equipment shall not result in the emission of any regulated air pollutant not previously emitted and shall not result in an emission increase as defined in IDAPA 58.01.01.007.

2 Coating Operations and Combustion Units (Building 4)

2.1 Process Description

The primary activity at Big Tex Trailer Manufacturing is the assembly and coating of utility trailers. Coating operations consist of a small surface prep process involving two wash bays that utilize a VOC-free solution to remove any debris from the trailers, and paint booths and associated heaters that utilize a primer application and drying process and a coating application and drying process.

2.2 Control Equipment Descriptions

Emissions from each paint booth are controlled with particulate filters.

Table 2.1 Coating Operations and Combustion Units

Emissions Units / Processes	Control Equipment	Emission Points
Booth # 1 (PB1)	Booth filter system and electrostatic air-assisted spray guns	Stacks PB1a and PB1b
Booth # 2 (PB2)	Booth filter system and electrostatic air-assisted spray guns	Stacks PB2a and PB2b
Booth # 3 (PB3)	Booth filter system and electrostatic air-assisted spray guns	Stacks PB3a and PB3b
Wash Booth Heater #1 (WB-1)	None	Stacks WB1a and WB1b
Wash Booth Heater #2 (WB-2)	None	Stacks WB2a and WB2b
Curing Oven #1 (CO-1)	None	Stack CO1
Curing Oven #2 (CO-2)	None	Stack CO2
Air Makeup Unit (AMU-1)	None	Stack AMU1

Emission Limits

2.3 Paint Booth Emission Limits

The emissions from each paint booth stack (PB1a, PB1b, PB2a, PB2b, PB3a, and PB3b) shall not exceed the emission rate limit in Table 2.2.

Table 2.2 Paint Booth Emission Limits ^(a)

Source Description	PM _{2.5} ^(b)	VOC ^(c)		Individual HAP ^{(d)(e)}	Total HAP ^{(d)(f)}
	lb/hr ^(g)	lb/hr ^(g)	T/yr ^(h)	T/yr ^(h)	T/yr ^(h)
Booth # 1 Stack PB1a	0.008	80.3	98.3	9.49	24.49
Booth # 1 Stack PB1b	0.008				
Booth # 2 Stack PB2a	0.008				
Booth # 2 Stack PB2b	0.008				
Booth # 3 Stack PB3a	0.008				
Booth # 3 Stack PB3b	0.008				

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM_{2.5}), including condensable particulate as defined in IDAPA 58.01.01.006.
- c) Volatile organic compounds (VOC).
- d) Hazardous air pollutants (HAP).
- e) Emission limit for each individual HAP.
- f) Emission limit for total of all HAP (combined).
- g) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ approved alternative. For VOC, pounds per hour of emissions from all paint booth stacks (combined).
- h) Tons of emissions from all paint booth stacks (combined) per any consecutive 12 calendar month period.

[January 6, 2017]

2.4 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into 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.

[January 6, 2017]

2.5 Opacity Limit

Emissions from each paint booth stack (PB1a, PB1b, PB2a, PB2b, PB3a, PB3b), each wash booth heater stack (WB1a, WB1b, WB2a, WB2b), each curing oven stack (CO1, CO2), and each air makeup unit stack (AMU1), or any other stack, vent, or functionally equivalent opening associated with any paint booth (PB1, PB2, and PB3), wash booth heater (WB-1, WB-2), curing oven (CO-1, CO-2), or air makeup unit (AMU-1) 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.

[January 6, 2017]

Operating Requirements

2.6 Coating Materials Usage Limits

The maximum amount of all coating materials used at the facility shall not exceed 420 gallons per calendar day (gal/day) and 38,421 gallons per rolling 12-calendar month period (gal/yr).

[January 6, 2017]

2.7 Fuel Usage

The rolling 12 calendar month natural gas used by the facility shall not exceed 52,500,000 standard cubic feet per year (scf/yr). The Wash Booth Heaters (WB-1 and WB-2), Curing Ovens (CO-1 and CO-2), and the Air Makeup Unit (AMU-1) shall only combust natural gas fuel.

[January 6, 2017]

2.8 Coating Material Formulations

The permittee shall use only the HAP-, TAP-, and VOC-containing coating materials listed in Table 2.3 as raw materials. Any changes in coating material formulations at the facility may require a permit to construct (or permit revision) in accordance with IDAPA 58.01.01.201 unless the usage of alternate coating material formulations can be demonstrated to result in emissions lower than the Paint Booth Emission Limits (Table 2.2), and result in emissions lower than all emission screening levels for toxic air pollutants (TAP) provided in IDAPA 58.01.01.585-586.

Table 2.3 Coating Materials

Coating Material	Description
Primer #1	R-Cure 200 Primer AD/FD Black Epoxy
Primer #1 – Catalyst	R-Cure 200 Epoxy Primer Curing Agent
Primer #1 – Thinner	Medium Urethane/Epoxy Reducer
Primer #2	Low HAPS AD Primer
Primer #2 – Catalyst	R-Cure 200 Epoxy Primer Curing Agent
Primer #2 – Thinner	Medium Urethane/Epoxy Reducer
Primer #3	Low HAPS CAT Yellow Primer
Primer #3 – Catalyst	R-Cure 200 Epoxy Primer Curing Agent
Primer #3 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat #1	R-Cure 800 Urethane Black
Topcoat #1 – Catalyst	Component B Urethane (Pail)
Topcoat #1 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat #2	R-Cure 800 Storm Grey Pearl Metallic R-Cure

Table 2.3 (continued)

Coating Material	Description
Topcoat #2 – Catalyst	Component B Urethane Catalyst (Pail)
Topcoat #2 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat #3	R-Cure 800 Arizona Beige Pearl Metallic
Topcoat #4 – Catalyst	Component B Urethane Catalyst (Pail)
Topcoat #4 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat #4	Gloss Black Low HAPs Acrylic
Topcoat #4 – Catalyst	Component B Urethane Catalyst (Pail)
Topcoat #4 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat #5	Silver Metallic R-Cure
Topcoat #5 – Catalyst	Component B Urethane Catalyst (Pail)
Topcoat #5 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat #6	Mocha Steel Metallic R-Cure 800
Topcoat #6 – Catalyst	Component B Urethane Catalyst (Pail)
Topcoat #6 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat # 7	Flame Red R-Cure
Topcoat #7 – Catalyst	Component B Urethane Catalyst (Pail)
Topcoat #7 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat #8	R-Cure Equipment Orange Metallic
Topcoat #8 – Catalyst	Component B Urethane Catalyst (Pail)
Topcoat #8 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat #9	GM Fleet White R-Cure (1)
Topcoat #9 – Catalyst	Component B Urethane Catalyst (Pail)
Topcoat #9 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat #10	GM Fleet White R-Cure (2)
Topcoat #10 – Catalyst	Component B Urethane Catalyst (Pail)
Topcoat #10 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat #11	Safety Yellow Urethane R-Cure
Topcoat #11 – Catalyst	Component B Urethane Catalyst (Pail)
Topcoat #11 – Thinner	Medium Urethane/Epoxy Reducer
Topcoat #12	Waterborne Underbody Coating
Topcoat #12 – Catalyst	None
Topcoat #12 – Thinner	None

[January 6, 2017]

2.9 Spray Gun and Booth Filter System Operation

- All coating activities at this facility shall be conducted inside a paint booth with filter system in place, exhaust fan(s) operating, and door(s) or curtain(s) closed. For complete vehicles and/or trailers, the booth must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or side curtains. For coating miscellaneous parts and products or vehicle subassemblies the preparation station must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the preparation station.
- All painting shall be conducted with electrostatic air-assisted spray guns or equivalent technology, with a minimum 80% transfer efficiency as documented by the spray gun manufacturer.
- The permittee shall install, maintain, and operate according to the manufacturer's specifications and recommendations, a spray booth filter system or a preparation station filter system with a minimum control efficiency of 99.53% for particulate emissions as documented by the filter manufacturer.

[January 6, 2017]

2.10 O&M Manual

The permittee shall have developed an Operation and Maintenance (O&M) Manual for the paint booth filtration systems. The O&M Manual shall describe the procedures that will be followed to ensure that all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit are at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintained in good working order and operate as efficient as practicable to meet the manufacturer's air pollution control device specifications. This manual shall remain on-site at all times and shall be made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

2.11 Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with the Odors Permit Condition. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date 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.

[January 6, 2017]

2.12 Coating Usage Monitoring

Each calendar day that coatings are used, the permittee shall monitor and record the amount of each coating material used at the facility in gallons per day (gal/day) to demonstrate compliance with the daily Coating Materials Usage limit.

Each calendar month, the permittee shall monitor and record the amount of each coating material used at the facility for the previous month in gallons per month (gal/mo) and for the previous 12 calendar months (gal/yr) to demonstrate compliance with the annual Coating Materials Usage limit.

[January 6, 2017]

2.13 Fuel Usage Monitoring

Each calendar month, the permittee shall monitor and record the amount of natural gas used by the facility for the previous month (scf/mo) and for the previous 12 calendar months (scf/yr) to demonstrate compliance with the Fuel Usage limit.

[January 6, 2017]

2.14 Coating Material Formulations and Equipment Replacement Monitoring

To ensure compliance with the Coating Material Formulations requirement when alternate coating materials are in use at the facility or when alternate process or control equipment are in use at the facility, records shall be maintained onsite demonstrating that facility-wide emissions will not exceed Paint Booth Emission Limits and will not exceed all emission screening levels in IDAPA 58.01.01.585–586 when such alternatives are used. Emissions shall be evaluated on a pollutant-by-pollutant basis.

- Each calendar day, the permittee shall monitor and record the facility-wide emissions of each individual TAP emitted in IDAPA 58.01.01.585 in pounds per day for the previous day (lb/day) and in pounds per hour over the 24-hour averaging period (lb/hr). For affected sources in 40 CFR 63.11169 paragraphs (a) through (c) (e.g., applicable paint stripping and mobile equipment coating operations), emissions of TAP also listed as HAP pursuant to Section 112(b) of the Clean Air Act may be excluded from each daily facility-wide emissions total (i.e., monitoring of non-HAP TAP emissions is required.)
- Each calendar month, the permittee shall monitor and record the facility-wide emissions of each individual TAP emitted in IDAPA 58.01.01.586 in pounds per month for the previous month (lb/mo), in pounds per year for the previous rolling 12 calendar month period (lb/yr), and in pounds per hour over the annual 12 calendar month averaging period (lb/hr). For affected sources in 40 CFR 63.11169 paragraphs (a) through (c), emissions of TAP also listed as HAP pursuant to Section 112(b) of the Clean Air Act may be excluded from each monthly facility-wide emissions total.
- Each calendar month, the permittee shall monitor and record the facility-wide emissions of each individual HAP, the total of all HAP, and VOC for the previous month (T/mo) and for the previous 12 calendar months (T/yr) to demonstrate compliance with Paint Booth Emission Limits.
- Documentation such as manufacturer's specification sheets that supports filter efficiencies, transfer efficiencies, capture efficiencies, and other engineering assumptions relied upon in facility-wide emission calculations shall be maintained onsite.

[January 6, 2017]

2.15 Material Purchase Records and Safety Data Sheets

For each material used at the facility, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, and thinner/reducer, the permittee shall record and maintain the following records:

- Material purchase records
- Safety Data Sheets (SDS)

[January 6, 2017]

2.16 Filter Pressure Drop

The permittee shall monitor and record the pressure drop across the filtration systems on a weekly basis. The pressure drop across the filtration system shall be maintained within the manufacturer's and O&M Manual specifications. Documentation of the operating pressure drop specifications for the filtration systems shall remain on-site at all times and shall be made available to DEQ representatives upon request.

2.17 Filter Inspection

Filters for the filtration system for the paint booths (PB1, PB2, and PB3) shall be checked and replaced as outlined in the O&M Manual's specifications. Documentation of the filter replacement shall remain on site at all times and shall be made available to DEQ representatives upon request.

40 CFR 63, Subpart HHHHHH Requirements

2.18 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, General Compliance Requirements

In accordance with 40 CFR 63.11172(a)(2) and IDAPA 58.01.01.210, on and after the date of initial startup of this facility the permittee shall comply with the emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- For each paint stripping operation, the permittee shall implement management practices to minimize the evaporative emissions of MeCl. The management practices must address, at a minimum, the practices in 40 CFR 63.11173(a)(1) through (5) as applicable:
 - Evaluate each application to ensure there is a need for paint stripping (e.g., evaluate whether it is possible to re-coat the piece without removing the existing coating).
 - Evaluate each application where a paint stripper containing MeCl is used to ensure that there is no alternative paint stripping technology that can be used.
 - Reduce exposure of all paint strippers containing MeCl to the air.
 - Optimize application conditions when using paint strippers containing MeCl to reduce MeCl evaporation (e.g., if the stripper must be heated, make sure that the temperature is kept as low as possible to reduce evaporation).
 - Practice proper storage and disposal of paint strippers containing MeCl (e.g., store stripper in closed, airtight containers).
- For each paint stripping operation that has annual usage of more than one ton of MeCl, the permittee shall develop and implement a written MeCl minimization plan to minimize the use and emissions of MeCl. The MeCl minimization plan must address, at a minimum, the management practices specified in 40 CFR 63.11173(a)(1) through (5) as applicable. Each operation must post a placard or sign outlining the MeCl minimization plan in each area where paint-stripping operations subject to this subpart occur. Paint stripping operations with annual usage of less than one ton of MeCl, must comply with these requirements, as applicable, but are not required to develop and implement a written MeCl minimization plan.
- For each paint stripping operation, the permittee shall maintain copies of annual usage of paint strippers containing MeCl on site at all times.

- For each paint stripping operation with annual usage of more than one ton of MeCl, the permittee shall maintain a copy of the current MeCl minimization plan on site at all times.
- The permittee shall meet the requirements of 40 CFR 63.11173(e)(1). All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in 40 CFR 63.11173(f). The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in 40 CFR 63.11173(f).
- All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of 40 CFR 63.11173(e)(2).
 - All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98% capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1.
 - Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.
 - Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.
- All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, or air-assisted airless spray gun, in accordance with 40 CFR 63.11173(e)(3).
- All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent, in accordance with 40 CFR 63.11173(e)(4). Spray gun cleaning may be done by using a fully enclosed spray gun washer.
- The permittee shall ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, are trained in the proper application of surface coatings as required by 40 CFR 63.11173(e)(1), in accordance with 40 CFR 63.11173(f). The training program must include, at a minimum:
 - A list of all current personnel by name and job description who are required to be trained;
 - Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
 - Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate;

Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke;

Routine spray booth and filter maintenance, including filter selection and installation; and

Environmental compliance with the requirements of 40 CFR 63, Subpart HHHHHH.

- A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required are not required to provide the initial training to these painters.
- All new and existing personnel at the facility, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, must be trained by the dates specified in 40 CFR 63.11173(g). Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.
 - All personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in 40 CFR 63.11173(f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
 - Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

[January 6, 2017]

2.19 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Applicability of General Provisions

The parts of the General Provisions which apply to the permittee are specified in Table 2.4, in accordance with 40 CFR 63.11174(a).

Table 2.4 Applicability of General Provisions to Subpart HHHHHH of Part 63

Citation	Subject	Explanation
40 CFR 63.1(a)(1)-(12)	General Applicability	
40 CFR 63.1(b)(1)-(3)	Initial Applicability Determination	Applicability of subpart HHHHHH is also specified in 40 CFR 63.11170.
40 CFR 63.1(c)(1)	Applicability After Standard Established	
40 CFR 63.1(c)(2)	Applicability of Permit Program for Area Sources	
40 CFR 63.1(c)(5)	Notifications	
40 CFR 63.2	Definitions	Additional definitions are specified in 40 CFR 63.11180.
40 CFR 63.3(a)-(c)	Units and Abbreviations	
40 CFR 63.4(a)(1)-(5)	Prohibited Activities	
40 CFR 63.4(b)-(c)	Circumvention/Fragmentation	
40 CFR 63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	
40 CFR 63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	40 CFR 63.11172 specifies the compliance dates.
40 CFR 63.6(c)(1)-(5)	Compliance Dates for Existing Sources	40 CFR 63.11172 specifies the compliance dates.
40 CFR 63.6(e)(1)-(2)	Operation and Maintenance	
40 CFR 63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	
40 CFR 63.6(f)(2)-(3)	Methods for Determining Compliance	
40 CFR 63.6(g)(1)-(3)	Use of an Alternative Standard	
40 CFR 63.6(i)(1)-(16)	Extension of Compliance	
40 CFR 63.6(j)	Presidential Compliance Exemption	
40 CFR 63.9(a)-(d)	Notification Requirements	40 CFR 63.11175 specifies notification requirements.
40 CFR 63.9(i)	Adjustment of Submittal Deadlines	
40 CFR 63.9(j)	Change in Previous Information	40 CFR 63.11176(a) specifies the dates for submitting the notification of changes report.
40 CFR 63.10(a)	Recordkeeping/Reporting—Applicability and General Information	
40 CFR 63.10(b)(1)	General Recordkeeping Requirements	Additional requirements are specified in 40 CFR 63.11177.
40 CFR 63.10(b)(2)(xii)	Waiver of recordkeeping requirements	
40 CFR 63.10(b)(2)(xiv)	Records supporting notifications	
40 CFR 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	
40 CFR 63.10(d)(1)	General Reporting Requirements	Additional requirements are specified in 40 CFR 63.11176.
40 CFR 63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	
40 CFR 63.10(f)	Recordkeeping/Reporting Waiver	
40 CFR 63.12	State Authority and Delegations	
40 CFR 63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Incorporation by Reference	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in 40 CFR 63.11173(e)(2) and (3) are incorporated and included in 40 CFR 63.14.
40 CFR 63.15	Availability of Information/Confidentiality	
40 CFR 63.16(a)	Performance Track Provisions—reduced reporting	

[January 6, 2017]

2.20 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Recordkeeping

In accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of this facility the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- The permittee shall keep the following records in accordance with 40 CFR 63.11177(a) through (d) and (h), and (e) through (g) as applicable.
 - Certification that each painter has completed the training specified in 40 CFR 63.11173(f) with the date the initial training and the most recent refresher training was completed.
 - Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in 40 CFR 63.11173(e)(2).
 - Copies of any notification submitted as required by 40 CFR 63.11175 and copies of any report submitted as required by 40 CFR 63.11176.
 - Records of paint strippers containing MeCl used for paint stripping operations, including the MeCl content of the paint stripper used. Documentation needs to be sufficient to verify annual usage of paint strippers containing MeCl (e.g., material safety data sheets or other documentation provided by the manufacturer or supplier of the paint stripper, purchase receipts, records of paint stripper usage, engineering calculations).
 - If more than one ton of MeCl is used annually in paint stripping operations, the permittee shall maintain a record of the current MeCl minimization plan on site for the duration of your paint stripping operations. The permittee shall also keep records of the annual review of, and updates to, the MeCl minimization plan.
 - Records of any deviation from the requirements in 40 CFR 63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
 - Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.
- The permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record in accordance with 40 CFR 63.11178(a). Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two-year period.
- In accordance with 40 CFR 63.11178(a), the permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two-year period.

[January 6, 2017]

2.21 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Reports

In accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of this facility the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- **Annual Notification of Changes Report.** In accordance with 40 CFR 63.11176, the permittee is required to submit a report in each calendar year in which information previously submitted in either the initial notification required by 40 CFR 63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted has changed. Deviations from the relevant requirements in 40 CFR 63.11173(a) through (d) or 40 CFR 63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the following information.
 - The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
- If a written MeCl minimization plan has not been developed and implemented for paint stripping operations in accordance with 40 CFR 63.11173(b), the permittee shall submit a report for any calendar year in which more than one ton of MeCl is used. This report must be submitted no later than March 1 of the following calendar year. The permittee shall also develop and implement a written MeCl minimization plan in accordance with 40 CFR 63.11173(b) no later than December 31. The permittee shall then submit a Notification of Compliance Status report containing the information specified in 40 CFR 63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in 40 CFR 63.11173(d) and 63.11177(f).
- Any notifications or reporting required by the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH or Subpart A – General Provisions shall be submitted to both of the following addresses in accordance with 40 CFR 63.13:

EPA Region 10, Mail Stop: OAW-150
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

and,

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard St.
Boise, ID 83706

Phone: (208) 373-0550
Fax: (208) 373-0287

[January 6, 2017]

2.22 Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Sources, 40 CFR Part 63, Subpart HHHHHH.

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[January 6, 2017]

3 Assembly Operations (Building 6)

3.1 Process Description

The primary activity at Big Tex Trailer Manufacturing is the assembly and coating of utility trailers. Assembly operations include plasma cutting, grinding, and gas metal arc welding (GMAW) of metal components to the specifications of the desired trailer.

3.2 Control Equipment Descriptions

Table 3.1 Assembly Operations

Emissions Units / Processes	Control Equipment	Emission Points
Plasma Cutter (PC-1)	Plasma Cutter (PC-1) Filtration System	Building 6 vents
Handheld Plasma Cutters (PC-2 through PC-9)	None	
Welders (GMAW-1 through GMAW-68)	None	
Grinders (MG-1 through MG-16)	None	

Emission Limits

3.3 Opacity Limit

Emissions from each Building 6 vent or any other stack, vent, or functionally equivalent opening associated with cutting (PC-1 through PC-9), welding (GMAW-1 through GMAW-68), or grinding (MG-1 through MG-16) activities 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

3.4 Cutting Operation Limits

Operation of the Plasma Cutter (PC-1) shall not exceed 424,500 linear feet of cut materials per year (ft/yr).

Operation of all Handheld Plasma Cutters (PC-2 through PC-9) shall not exceed 1,536,000 linear feet of cut materials per year (ft/yr).

3.5 Welding Material Usage Limit

The maximum amount of all welding electrode materials used shall not exceed 600,000 pounds per calendar year (lb/yr).

3.6 Grinding Material Usage Limit

The maximum amount of all grinding wheel materials used shall not exceed 300,000 pounds per calendar year (lb/yr).

3.7 Plasma Cutter (PC-1) Filtration System Operation

The permittee shall operate the Plasma Cutter (PC-1) Filtration System at all times when the Plasma Cutter (PC-1) is operating. Any period of time that the Plasma Cutter (PC-1) is in operation while the Plasma Cutter (PC-1) Filtration System is not in operation shall be treated as an excess emission event, and the permittee shall comply with excess emission procedures and requirements included in the General Provisions of this permit.

Monitoring and Recordkeeping Requirements

3.8 Cutting Operation Monitoring

Each calendar month, the permittee shall monitor and record the linear feet of material cut in the Plasma Cutter (PC-1) for the previous month in feet of material cut per month (ft/mo) and for the previous 12 calendar months in feet of material cut per year (ft/yr) to demonstrate compliance with Cutting Operation Limits.

Each calendar month, the permittee shall monitor and record the operating hours of the Handheld Plasma Cutters (PC-2 through PC-9) for the previous month in feet of material cut per month (ft/mo) and for the previous 12 calendar months in feet of material cut per year (ft/yr) to demonstrate compliance with Cutting Operation Limits.

Records shall be maintained in accordance with the monitoring and recordkeeping requirements included in the General Provisions of this permit.

3.9 Welding Material Usage Monitoring

Each calendar month, the permittee shall monitor and record of the amount of electrode materials used in the Welders (GMAW-1 through GMAW-68) for the previous month in pounds per month (lb/mo) and for the previous 12 calendar months (lb/yr) to demonstrate compliance with the Welding Material Usage Limit.

Records shall be maintained in accordance with the monitoring and recordkeeping requirements included in the General Provisions of this permit.

3.10 Grinding Material Usage Monitoring

Each calendar month, the permittee shall monitor and record of the amount of grinding wheel materials used in the Grinders (MG-1 through MG-16) for the previous month in pounds per month (lb/mo) and for the previous 12 calendar months (lb/yr) to demonstrate compliance with the Grinding Material Usage Limit.

Records shall be maintained in accordance with the monitoring and recordkeeping requirements included in the General Provisions of this permit.

- 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; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 4.7 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.
- 4.8 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.
- 4.9 Within 60 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 and 4/11/15]

Monitoring and Recordkeeping

- 4.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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, 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]

4 General Provisions

General Compliance

4.1 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, 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.]

4.2 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]

4.3 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

4.4 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, 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 Notification

4.5 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]

4.6 The permittee shall furnish DEQ written notifications as follows:

- 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;

Excess Emissions

- 4.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 4.12 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

- 4.13 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

- 4.14 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

- 4.15 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

- 4.16 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]