



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. Tippetts, Director

November 15, 2017

Dean Hearst, Production Manager
Trinity Trailer MFG, Inc.
7533 S. Federal Way
Boise, ID 83716

RE: Facility ID No. 001-00343, Trinity Trailer Mfg., Inc. – Federal Way, Boise
Final Permit Letter

Dear Mr. Hearst:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2017.0045 Project 61930 to Trinity Trailer Mfg., Inc. – Federal Way located at Boise for a truck trailer repair operation. 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 August 2, 2017.

This permit is effective immediately. This permit does not release Trinity Trailer Mfg., Inc. – Federal Way 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 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, AQ Compliance Officer, at (208) 373-0419 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 Rakaël Pope at (208) 373-0502 or rakael.pope@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\rp

Permit No. P-2017.0045 PROJ 61930

Enclosures

Air Quality

PERMIT TO CONSTRUCT

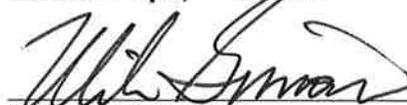
Permittee Trinity Trailer Mfg., Inc. – Federal Way
Permit Number P-2017.0045
Project ID 61930
Facility ID 001-00343
Facility Location 7533 S. Federal Way
Boise, ID 83716

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 November 15, 2017


Rakael Pope, Permit Writer


Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is the initial permit to construct (PTC) a for an existing truck trailer repair facility.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Equipment Group	Sources	Control Equipment
2	<u>Welders</u>	<u>Welder (W1, W2, & W3):</u> Manufacturer: Miller Model: SMT350 Manufacture Date: 2013 Weld Type: GMAW (MIG), TIG	<u>Fume Extractor(K-W1, K-W2, K-W3, K-W5, K-W6):</u> Manufacturer: Kemper Manufacture Date: 2017 Model: Filter Master XL Type: Cartridge filter PM/ PM ₁₀ /PM _{2.5} efficiency: 99% or better
		<u>Welder (W4, W5, and W6):</u> Manufacturer: Miller Model: ALT304 Manufacture Date: 2013 Weld Type: GMAW (MIG), TIG	
3	<u>Plasma Cutters</u>	<u>Handheld Plasma Cutters (PC1, PC2, PC3, PC4):</u> Manufacturer: Hypertherm Model: Powermax 65 Maximum current rating: 65A	<u>Fume Extractor (K1, K2, K3, K4):</u> Manufacturer: Kemper Model: Kemper Master XL Type: Cartridge filter PM/ PM ₁₀ /PM _{2.5} efficiency: 99.98%
4	<u>Coating</u>	<u>Coating Spray Gun:</u> Manufacturer: 3M Model: Accuspray 16570 Manufacture Date: 2013 Spray Gun Type: HVLP Transfer Efficiency: at least 60%	None

2 Welding Operations

2.1 Process Description

This facility conducts welding operations in the main shop area vented with fume extractor flexible ducting. Welding includes Gas Metal Arc Welding (GMAW, also referred to as Metal Inert Gas, MIG welding) and Tungsten Inert Gas (TIG) welding. No Flux Cored Arc Welding (FCAW) is used. Welding is done on carbon steel and stainless steel.

2.2 Control Device Descriptions

Table 2.1 Welding Operations Description

Emissions Units / Processes	Control Devices
MIG/TIG Welders (6)	Fume Extractor (6): Manufacturer: Kemper or equivalent Model: Filter Master XL or equivalent Filtration Method: Cartridge filter PM/PM ₁₀ /PM _{2.5} control efficiency: ≥99%

Emission Limits

2.3 Emission Limits

The emissions from the welding operations shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Welding Operations Emission Limits ^(a)

Source Description	PM ₁₀ ^(b)	
	lb/hr ^(c)	T/yr ^(d)
Welding	9.01E-06	2.59E-05

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.

2.4 Opacity Limit

Emissions from the welding operation through any vent or any other stack, vent, or functionally equivalent opening associated with the welding operations shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.5 Welding Operation Throughput Limits

Welding operations at this facility are limited to gas metal arc welding (GMAW), also known as Metal Inert Gas welding (MIG), and Tungsten Inert Gas (TIG) welding. The following limits for electrode material shall not be exceeded:

Table 2.3 Permitted Electrode Material Limit

Welding Material	Permitted Limit
ER80S-D2	472.5 lb/year
308LSi	483.6 lb/year

Alternate equivalent welding electrode materials may be used if it is demonstrated that the types and amounts of alternate welding electrode materials result in emissions equal or lower than the emission screening levels for toxic air pollutants (TAP) provided in IDAPA 58.01.01.585-586.

2.6 Fume Extraction with Welding Requirement

The welding operations shall be conducted only with an operational fume extraction system appropriately placed and used according to manufacturer's instructions.

2.7 Filter Maintenance Requirement

The fume extraction system filter shall be maintained and changed according to the manufacturer's recommendation.

Monitoring and Recordkeeping Requirements

2.8 Throughput Monitoring for Welding Operations

Each calendar month, the permittee shall monitor and record the amount of welding materials used. Records shall be maintained for the previous twelve calendar months (lb/yr) to demonstrate compliance with annual welding material usage limits. Supporting information includes, but is not limited to receipts and inventory logs.

2.9 Filter Inspection and Maintenance

The permittee shall maintain records of the results of inspection and maintenance of the welding operation fume extractor equipment, including filter checks and replacement. This documentation shall remain on site at all times and shall be made available to DEQ representatives upon request.

3 Plasma Cutting Operations

3.1 Process Description

The facility performs cutting operations using the Handheld Plasma Cutters. Fumes from plasma cutters are collected and controlled by fume extractor flexible ductwork at point of use.

3.2 Control Device Descriptions

Table 3.1 Plasma Cutting Operations Description

Emissions Units / Processes	Control Devices
Plasma Cutters (4)	Fume Extractor (4): Manufacturer: Kemper Model: Kemper Filter Master XL or equivalent Filtration method: Cartridge filter PM/PM ₁₀ /PM _{2.5} control efficiency: ≥99.8%

Emission Limits

3.3 Emission Limits

The emissions from the Plasma cutting operations shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Plasma Cutting Operations Emission Limits ^(a)

Source Description	PM ₁₀ ^(b)		NO _x	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Plasma Cutting	6.4E-04	1.20E-03	1.26E+00	1.42E+00

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.

3.4 Opacity Limit

Emissions from the plasma cutting operation vent or any other stack, vent or functionally equivalent opening associated with the plasma cutting operations shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

3.5 Plasma Cutting Throughput Limits

Operation of plasma cutting equipment to process stainless steel and steel shall not exceed 2,262 hours per year (hr/yr).

3.6 Fume Extraction Requirement

Plasma cutting operations shall be conducted only with an operational fume extraction system appropriately placed and used according to the fume extraction system manufacturer's recommendation.

3.7 Fume Extractor Maintenance Requirement

The fume extraction system filter shall be maintained and changed according to the manufacturer's recommendation.

Monitoring and Recordkeeping Requirements

3.8 Throughput Monitoring for the Plasma Cutting operation

Each calendar month, the permittee shall monitor and record the operating hours of the plasma cutting operations for steel and stainless steel for the previous month in hours per month (hr/mo) and for the previous twelve calendar months in hours per year (hr/yr) to demonstrate compliance with permitted limits. Supporting information includes receipts and inventory logs.

3.9 Documentation of Fume Extractor Maintenance and Inspection

The permittee shall maintain records of the results of inspection and maintenance of the welding operation fume extractor equipment, including filter checks and replacement. This documentation shall remain on site at all times and shall be made available to DEQ representatives upon request.

4 Coating Operations

4.1 Process Description

Coatings are manually applied using a 3M Accuspray 16750 air assisted HVLP spray gun with six hundred milliliter cup size. Painting is performed in the general warehouse area without a paint spray booth or other emission controls.

4.2 Control Device Descriptions

Table 4.1 Coating Operations Description

Emissions Units / Processes	Control Devices
HVLP Spray Gun	none

Emission Limits

4.3 Daily Coating Emission Limits

The PM₁₀ and VOC emissions from the coating operations shall not exceed any emissions rate limit in the following table.

Table 4.2 Coating Operation Emission Limits^(a)

Source	PM10 ^(b)		VOC ^(c)		HAP	
	lb/day ^(d)	T/yr ^(e)	lb/day ^(d)	T/yr ^(e)	lb/day ^(d)	T/yr ^(e)
Coating Operations	7.0E+00	9.0E-01	1.9E+01	2.4E+00	7.8E+00	1.0E+00

- In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- Volatile organic compounds (VOC).
- Pounds per any consecutive 24-hour period.
- Tons per any consecutive 12-calendar month period.

4.4 Opacity Limit

Emissions from the coating operations vent or functionally equivalent opening associated with the coating operations, 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.

4.5 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.

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.

Operating Requirements

4.6 Approved Daily Coating Usage Scenario

Unless the permittee is complying with an Alternate Daily Usage Scenario which demonstrates compliance with Coating Operation Emission Limits and Coating Operation Screening Emission Rates and Modeled Concentration Limits, the permittee shall comply with the daily coating

material usage limits in the following table:

Table 4.3 Approved Coating List with Daily Limit

Coating	Manufacturer	Daily Limit gal/day ^(a)
Amercoat 370 Cure (Primer)	PPG	0.24
Amercoat 370 Pearl Gray Resin (Primer)	PPG	0.62
Amercoat 866m Accelerator (Topcoat)	PPG	0.12
Amershield Cure (Topcoat)	PPG	0.24
Amershield Black Resin	PPG	0.62 ^(a)
Amershield Deep Tint Resin	PPG	
Amershield Light Tint Resin	PPG	
Amershield Neutral Tint Resin	PPG	
Amershield Bright Red Resin	PPG	
Amershield Trinity White Resin	PPG	
Amershield Red Tint Resin	PPG	
Amershield High Hiding Yellow Tint	PPG	
Composite Topcoat Finish Paint	PPG	
Amercoat 101 Primer Thinner	PPG	0.40 ^(b)
Amercoat 923 Topcoat Thinner	PPG	
Aerosol Injected Cleaner	Eastwood	

- a) Gallons per calendar day.
- b) Combined total daily allowance in gallons per calendar day of Composite Topcoat Finish Paint, Amershield High Hiding Yellow Tint, Amershield Red Tint Resin, Amershield Trinity White Resin, Amershield Bright Red Resin, Amershield Neutral Tint Resin, Amershield Light Tint Resin, Amershield Deep Tint Resin, and Amershield Black Resin.
- c) Combined total daily allowance in gallons per calendar day of Amercoat 101 Primer Thinner, Amercoat 923 Topcoat Thinner, and Aerosol Injected Cleaner.

4.7 Spray gun requirement

All coating operations shall be conducted with an HVLP spray gun, or equivalent technology, with a minimum 60% transfer efficiency as documented by the spray gun manufacturer. These records shall be made available to DEQ upon request.

Monitoring and Recordkeeping Requirements

4.8 Coating Materials Usage Recordkeeping

Each calendar day that coating operations are conducted, the permittee shall collect and maintain records of the following information to be used to demonstrate compliance with the permitted limits on a calendar day basis:

- product name/code of the material
- quantity of each material from Table 4.3 used in the automotive coating process, including but not limited to primer, primer curing agent, topcoat, thinner, topcoat curing agent, topcoat accelerator, clear coat, catalyst, activator, hardener, cleaning solvent, or any other coating.

4.9 Material Purchase Records and Safety Data Sheets

For each material from Table 4.3 used in the automotive coating process, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, thinner/reducer, undercoating, and curing agents, the permittee shall record and maintain the following records:

- Material purchase records
- Safety Data Sheets (SDS)

Alternate Coating Usage Scenario

If the permittee proposes to use coating materials other than those listed in Table 4.3 (such as when new or reformulated coating materials are introduced), the permittee shall follow the procedures of this section. The permittee shall not use any Daily Usage Scenario until TAP compliance and Emission Limit compliance have been demonstrated for that Scenario according to the following procedures.

4.10 Propose a Daily Coating Usage Scenario

Prior to using or implementing a Daily Usage Scenario:

- The permittee shall propose and record maximum daily usage limits for each coating material that will be used in the Scenario, in gallons per day (gal/day). The permittee shall not use or implement any Scenario that does not have recorded maximum daily usage limits.
- The permittee shall estimate emissions of PM₁₀, VOC, individual HAP, total HAP, and all TAP listed in Table 4.4 for the Scenario (lb/day for each pollutant), using the procedures described below for estimating emissions.
- The permittee shall demonstrate TAP compliance for the Scenario, using the procedures described below for demonstrating TAP compliance. The permittee shall not use or implement any Scenario that does not demonstrate TAP compliance.
- The permittee shall demonstrate Emission Limit compliance for the Scenario, using the procedures described below for demonstrating Emission Limit compliance. The permittee shall not use or implement any Scenario that does not demonstrate Emission Limit compliance.
- The coating daily usage limits and emission estimates used in the TAP and Emission Limit compliance demonstrations shall be based on comparison of the estimated emissions from all coatings to be used from all coating operations at the facility (i.e., facility-wide).

4.11 Estimate Coating TAP Emissions

TAP emissions shall be estimated for all TAP listed in Table 4.4:

- Emissions shall be estimated by multiplying each coating maximum daily usage rate (gal/day) by the TAP content (lb/gal) of that coating, and summing the total emissions from all coatings (lb/day). TAP emissions which are designated as a particulate in Table 4.4 may also be multiplied by one minus the documented spray gun transfer efficiency.
- TAP content (lb/gal) of a coating is specified on the Safety Data Sheet (SDS) for that coating, or shall be calculated by multiplying the weight percentage of TAP (%) by the density (lb/gal) of the coating from the SDS.
- For TAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the TAP content is below detection and cannot be determined from SDS or other documentation, the TAP content shall be assumed to be the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.

4.12 Demonstrate Coating TAP Compliance

For each Daily Usage Scenario, emissions shall be estimated and compared against the TAP Screening Emission Rates or Modeled Concentration Limits in Table 4.4:

- The permittee shall compare estimated TAP emissions for all coatings against the Screening Emission Rates in Table 4.5. For emissions equal or less than the Screening Emission Rate, modeling analyses is not required. For emissions in excess of the Screening Emission Rate, modeling analyses is required to determine the maximum modeled concentration.
- Modeled emissions from all coating operations for a Daily Usage Scenario shall not exceed the Modeled Concentration Limits in Table 4.4. The permittee shall not use or implement any Scenario that exceeds a Modeled Concentration Limit.

- All modeling analyses shall use EPA-approved models and follow relevant guidance in the most recent version of the “State of Idaho Guideline for Performing Air Quality Impact Analyses,” available for download at DEQ’s website.

Table 4.4 TAP Screening Emission Rates and Modeled Concentration Limits

TAP	CAS	Particulate?	Screening Emission Rate (lb/day) ^(a)	Modeled Concentration Limit (mg/m ³) ^(b)
Acetone	67-64-1	No	2856	89
Acrylamide	79-06-1	No	0.0001224	0.00000077
Aluminum - Metal and Oxide	7429-90-5	Yes	16.008	0.5
Aluminum - Soluble Salts	7429-90-5	Yes	3.192	0.1
n-Amyl Acetate	628-63-7	No	847.2	26.5
Antimony & Compounds, as Sb	7440-36-0	Yes	0.792	0.025
Barium (Soluble Compounds), as Ba	7440-39-3	Yes	0.792	0.025
Benzene	71-43-2	No	0.0192	1.20E-04
Bis (2-Ethylhexyl) Phthalate (DEHP)	117-81-7	No	0.672	0.0042
2-Butoxyethanol	111-76-2	No	192	6
2-Butoxyethyl Acetate	112-07-2	No	199.92	1.25
n-Butyl Alcohol	71-36-3	No	240	7.5
n-Butyl Acetate	123-86-4	No	1135.2	35.5
Calcium Carbonate	1317-65-3	Yes	16.008	0.5
Carbon Black	1333-86-4	Yes	5.52	0.175
Chromium Metal, Chromium (III) Compounds as Cr	7440-47-3, 16065-83-1	Yes	0.792	0.025
Cumene	98-82-8	No	391.2	12.25
Cyclohexane	110-82-7	No	1680	52.5
Cyclohexanone	108-94-1	No	160.08	5
Diacetone Alcohol	123-42-2	No	384	12
Dibutyl Phthalate	84-74-2	No	7.992	0.25
1,4-Dichlorobenzene	106-46-7	No	720	22.5
o-Dichlorobenzene	95-50-1	No	480	15
Diethyl Phthalate	84-66-2	No	7.992	0.25
Diisobutyl Ketone	108-83-8	No	232.08	7.25
Dimethylphthalate	131-11-3	No	7.992	0.25
Dipropylene Glycol Methyl Ether	34590-94-8	No	960	30
Ethyl Acetate	141-78-6	No	2239.2	70
Ethyl Alcohol	64-17-5	No	3000	94
Ethyl Benzene	100-41-4	No	696	21.75
Ethylene Glycol Vapor	107-21-1	No	20.304	6.35
Formaldehyde	50-00-0	No	0.01224	7.70E-05
Heptane (n-Heptane)	142-82-5	No	2616	82
Hexamethylene Diisocyanate	822-06-0	No	0.048	0.0015

TAP	CAS	Particulate?	Screening Emission Rate (lb/day) ^(a)	Modeled Concentration Limit (mg/m ³) ^(b)
Hexane (n-Hexane)	110-54-3	No	288	9
Iron Oxide Fume (Fe ₂ O ₃) as Fe	1309-37-1	Yes	7.992	0.25
Isobutyl Acetate	110-19-0	No	1120.8	35
Isobutyl Alcohol	78-83-1	No	240	6
Isophorone Diisocyanate	4098-71-9	No	0.144	0.0045
Isopropyl Alcohol	67-63-0	No	1567.2	49
Isopropyl Acetate	108-21-4	No	1663.2	52
Kaolin	1332-58-7	Yes	3.192	0.1
Manganese as Mn, Dust & Compounds	7439-96-5	Yes	7.992	0.25
Magnesite	546-93-0	Yes	16.008	0.5
Methanol	67-56-1	No	415.2	13
1-Methoxy-2-Propanol Acetate	108-65-6	No	576	3.6
2-Methoxyethyl Acetate	110-49-6	No	38.4	1.2
Methyl Acetate	79-20-9	No	976.8	30.5
Methyl n-Amyl Ketone	110-43-0	No	376.8	11.75
Methyl Chloroform	71-55-6	No	3048	95.5
Methyl Ethyl Ketone (MEK)	78-93-3	No	943.2	29.5
Methyl Isoamyl Ketone	110-12-3	No	384	12
Methyl Isobutyl Carbinol	108-11-2	No	166.32	5.2
Methyl Isobutyl Ketone (MIBK)	108-10-1	No	328.8	10.25
Methyl Methacrylate	80-62-6	No	655.2	20.5
Methylene Chloride	75-09-2	No	0.0384	2.40E-04
Methylene Diisocyanate (MDI)	101-68-8	No	0.072	0.0025
Methyl Propyl Ketone	107-87-9	No	1120.8	35
Mica (Respirable Dust)	12001-26-2	Yes	4.8	0.15
Molybdenum as Mo	7439-98-7	Yes	7.992	0.25
Naphthalene	91-20-3	No	79.92	2.5
Nickel	7440-02-0	Yes	0.000648	4.20E-06
Nonane	111-84-2	No	1680	52.5
Pentane	109-66-0	No	2832	88.5
Phenol	108-95-2	No	30.48	0.95
Phosphoric Acid	7664-38-2	No	1.608	0.05
Propionic Acid	79-09-4	No	48	1.5
Propyl Alcohol	71-23-8	No	799.2	25
n-Propyl Acetate	109-60-4	No	1344	42
Selenium	7782-49-2	Yes	0.312	0.01
Silica – Amorphous	112926-00-8	Yes	16.008	0.5
Silica - Crystalline Quartz & Fused Silica	14808-60-7	Yes	0.1608	0.005
Silica - Crystalline – Cristobalite	14464-46-1	Yes	0.0792	0.0025

TAP	CAS	Particulate?	Screening Emission Rate (lb/day) ^(a)	Modeled Concentration Limit (mg/m ³) ^(b)
Stoddard Solvent	8052-41-3	No	840	26.25
Styrene	100-42-5	No	160.08	1
Tetrahydrofuran	109-99-9	No	943.2	29.5
Toluene	108-88-3	No	600	18.75
Triethylamine	121-44-8	No	6.48	0.2
Trimethyl Benzene (Mixed and Individual Isomers)	25551-13-7	No	196.8	6.15
Vinyl Acetate	108-05-4	No	55.2	1.75
VM&P Naphtha	8032-32-4	No	2191.2	68.5
Xylene (o-, m-, p-isomers)	1330-20-7	No	696	21.75
Zinc	7440-66-6	Yes	16.008	0.5
Zinc Oxide Dust	1314-13-2	Yes	16.008	0.5

- a) Worst-case pounds of emissions from all coating operations (combined) per day, as calculated using procedures in this permit to estimate TAP emissions, or as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.
- b) Milligrams of toxic air pollutant (TAP) per cubic meter, modeling proposed emission rates calculated using a daily averaging period.

4.13 Demonstrate Coating Emission Limit Compliance

For each Daily Usage Scenario, emissions from all coating operations shall be estimated and compared against the Emission Limits in Table 4.2:

- PM₁₀ emissions shall be estimated by multiplying each coating maximum daily usage rate (gal/day) by the solids content (lb/gal) of that coating, and summing the total emissions from all coatings (lb/day). Emissions may also be multiplied by one minus the transfer efficiency.
- VOC emissions shall be estimated by multiplying each coating maximum daily usage rate (gal/day) by the VOC content (lb/gal) for that coating, and summing the total emissions from all coatings (lb/day).
- HAP emissions shall be estimated by multiplying each coating maximum daily usage rate (gal/day) by the HAP content (lb/gal) for that coating, and summing the total emissions from all coatings (lb/day).
- For solids content, VOC content, HAP content, and TAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the solids content, VOC content, HAP content, or TAP content cannot be determined from SDS or other documentation, the density of the coating (lb/gal) shall be used when estimating emissions.
- The permittee shall compare estimated emissions for all coatings against the Emission Limits in Table 4.2. The permittee shall not use or implement any Scenario that exceeds an Emission Limit.

4.14 Coating Usage Scenario Monitoring

Each calendar day that coating operations are conducted, the permittee shall select and record the Daily Usage Scenario that will be used for that day, and comply with the maximum daily coating usage limits specified for the selected Daily Usage Scenario.

- Only one Daily Usage Scenario may be used each calendar day.
- The permittee shall not exceed any daily coating usage limit for the Scenario chosen that calendar day.

- The permittee shall maintain documentation such as coating material SDS, manufacturer's specification sheets that support filter control efficiencies, transfer efficiencies, capture efficiencies, and other engineering assumptions relied upon in emission calculations.

4.15 Coating Usage Scenario Reporting

Each year, the permittee shall submit a report by May 1st on all Daily Usage Scenarios used each calendar day during the previous 365-day period. The report shall include documentation supporting the TAP compliance evaluations and the Emission Limit compliance evaluations relied upon for each Daily Usage Scenario, and any modeling analyses conducted in the TAP compliance evaluation. Documentation should be in sufficient detail, including documentation of all calculations and electronic copies of modeling files, such that DEQ can verify the analysis. The report shall be titled "Permit-Required Modeling Report" and shall be sent to:

DEQ State Office
Air Quality Division
1410 N. Hilton
Boise, ID 83706

4.16 Material Purchase Records and Safety Data Sheets

For each alternate coating material used at the facility, including but not limited to primers, stains, basecoats, glazes, sealers, lacquers, thinners, solvents, reducers, caulking, and adhesives, the permittee shall record and maintain the following records:

- Material purchase records
- Safety Data Sheets (SDS)

5 General Provisions

General Compliance

5.1 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.]

5.2 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]

5.3 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

5.4 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

5.5 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]

5.6 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;

- 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

- 5.7 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.
- 5.8 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.
- 5.9 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 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

- 5.10 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]

Excess Emissions

- 5.11 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

- 5.12 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

- 5.13 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

- 5.14 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

- 5.15 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

- 5.16 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]