



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

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

September 14, 2018

Mike Lemrick, President  
Gem State Manufacturing - Skyway  
3820 Skyway  
Caldwell, Idaho 83605

RE: Facility ID No. 027-00172, Gem State Manufacturing – Skyway, Caldwell  
Final Permit Letter

Dear Mr. Lemrick:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2018.0025 Project 62039 to Gem State Manufacturing - Skyway located at Caldwell for an initial PTC of an existing truck trailer manufacturing facility. 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 March 26, 2018.

This permit is effective immediately. This permit does not release Gem State Manufacturing - Skyway 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 at, 1445 N. Orchard St., Boise Idaho 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) 373-0419 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 Christina Boulay at (208) 373-0502 or christina.boulay@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\cb

Permit No. P-2018.0025 PROJ 62039  
Enclosures

## Air Quality

### PERMIT TO CONSTRUCT

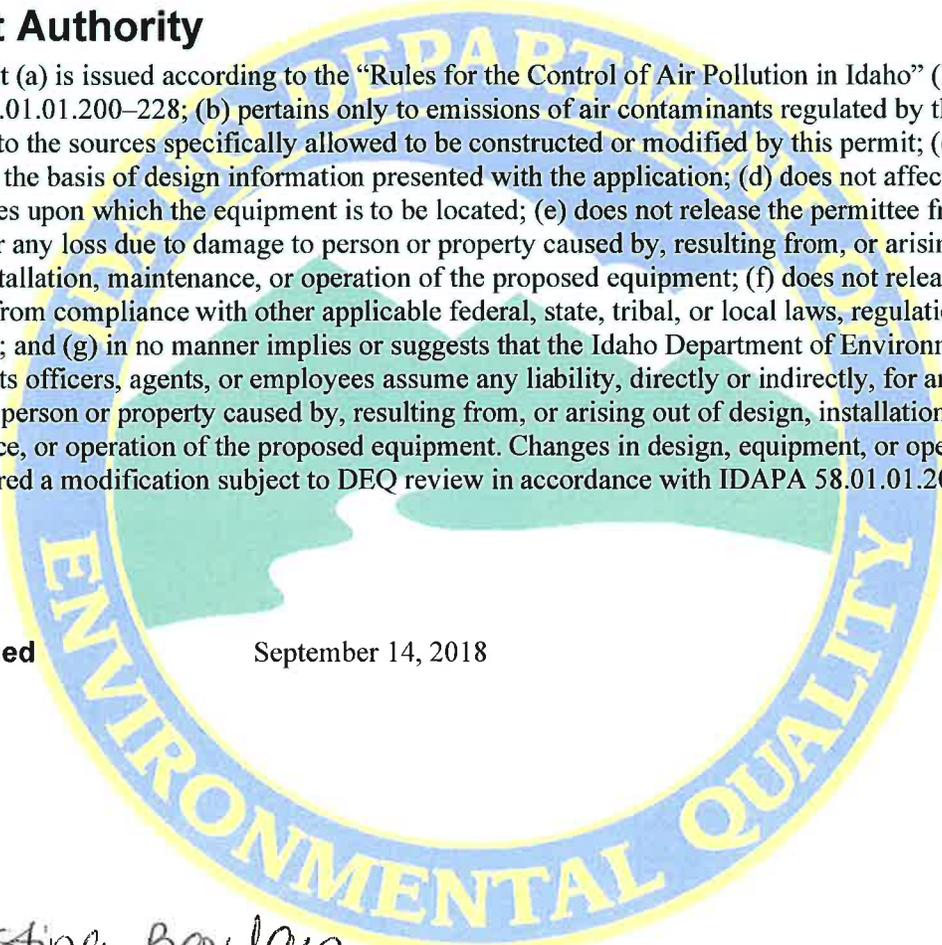
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**Permittee** Gem State Manufacturing - Skyway  
**Permit Number** P-2018.0025  
**Project ID** 62039  
**Facility ID** 027-00172  
**Facility Location** 3820 Skyway  
Caldwell, Idaho 83605

### 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** September 14, 2018

  
*Christina Boulay*  
Christina Boulay, Permit Writer

*Mike Simon*  
Mike Simon, Stationary Source Manager

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# 1 Permit Scope

## Purpose

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

## Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Sources	Control Equipment
2	<u>CNC Plasma Cutting Machine:</u> Manufacturer: AKS Cutting Systems Model: accu-kut Max. capacity: 1200 IPM Manufacture Date: 2017	<u>Control Device Name:</u> Manufacturer: CMAXX Fume Extraction System Model: Imperial Systems CMAXX Fume Extraction System PM <sub>10</sub> control efficiency: 99.9% Enclosed Building PM <sub>10</sub> Control Efficiency: 50.0% Manufacture Date: September 2017
	<u>WeldPro Welding:</u> Manufacturer: Andersen Industries, Inc. Model: WeldPro360 Manufacture Date: Sept 2017 Weld Type: GMAW (MIG)  <u>Various Hand Welders:</u> Hand Metal Inert Gas (MIG Welding)	<u>WeldPro 360 Fume Extractor:</u> Manufacturer: WeldPro 360 Fume Extraction Manufacture Date: Sept 2017 PM/ PM10/PM2.5 Control Efficiency: 0.0%
3	<u>Semi-Automated Abrasive Blasting:</u> Manufacturer: Blast Cleaning Products (BCP) Model: Autoblaster Max. capacity: 1480 lbs media/minute Manufacture Date: November 1996	<u>Control Device Name:</u> Manufacturer: BCP Model: Donaldson Torit Ultra-Web Cartridge, MERV 15 PM <sub>10/2.5</sub> control efficiency: 90.0% Model: Donaldson Torit Ultra-Web Cartridge, MERV 16 PM <sub>10/2.5</sub> control efficiency: 95.0% Enclosed Building PM <sub>10/2.5</sub> Control Efficiency: 50.0% Manufacture Date: September 2017
4	<u>Paint Booth:</u> Type: Side draft, dry filters Manufacture Date: November 2017	<u>Filter:</u> Manufacturer: Superior Fibers, LLC Model: TGT21—12-OT/PA12 Filter Efficiency: 98.7% Manufacture Date: November 201
	<u>Spray Gun(s):</u> Manufacturer: Iwata Model: LPH200 Type: HVLP Transfer Efficiency: 65% Manufacture Date: November 2017	
5	<u>Two (2) HVAC Units:</u> Manufacturer: Titan Model: TA-130 NG VLH AR/80 Heat Input Rate: 2.475 MMBtu/hr Fuel Type: Natural Gas Manufacture Date: September 2017	None
	<u>Curing Room Heater:</u> Manufacturer: Trane Model: DFOA118FNAB1ACF13AOABJLNPY Heat Input Rate: 0.825 MMBtu/hr Fuel Type: Natural Gas Manufacture Date: November 2017	

## 2 Cutting and Welding Fabrication

### 2.1 Process Description

Raw steel, plate steel and pre-fabricated steel pieces are delivered to the facility. The raw steel and plate steel is cut and welded into product components. The steel is cut using a steel saw or Computer Numeric Control (CNC) plasma cutting machine. The CNC plasma table is equipped with a CMAXX downdraft fume extraction system with cartridge filters, and the unit exhausts inside the building.

After the raw, plate, and pre-fabricated steel are cut and cleaned they are received in the pre-fabrication, support parts, fabrication area, or the specialty line for welding. Welding in the pre-fabrication, support parts area, and the specialty line is conducted using hand metal inert gas (MIG) welding. The hand welders are not equipped with any control or fume extraction.

Welding in the fabrication area is conducted using the WELDPRO360 welding booms, which are equipped with the integrated WELDPRO Clean Air Fume Extraction System. All welding emissions exhaust inside the main building, and the electrode used is the E70C-6M H4.

### 2.2 Control Device Descriptions

Table 2.1 Plasma Cutting and Welding Description

Emissions Units / Processes	Control Devices
<p><u>CNC Plasma Cutting Machine:</u>                      Manufacturer: AKS Cutting Systems                      Model: accu-kut                      Max. capacity: 1200 IPM                      Manufacture Date: 2017</p>	<p><u>Control Device Name:</u>                      Manufacturer: CMAXX Fume Extraction System                      Model: Imperial Systems CMAXX Fume Extraction System                      PM<sub>10</sub> control efficiency: 99.9%                      Enclosed Building PM<sub>10</sub> Control Efficiency: 50.0%                      Manufacture Date: September 2017</p>
<p><u>WeldPro Welding:</u>                      Manufacturer: Andersen Industries, Inc.                      Model: WELDPRO 360                      Max. capacity: 60 lb spool, 905 spools/year                      Manufacture Date: September 2017</p> <p>Various Hand Welders:                      Hand Metal Inert Gas (MIG Welding)</p>	<p><u>WeldPro 360 Fume Extraction:</u>                      Manufacturer: WeldPro 360 Fume Extraction System                      PM<sub>10</sub> control efficiency: 0.0% (Not being used)                      Manufacture Date: September 2017</p>

## Emission Limits

### 2.3 Emission Limits

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

Table 2.2 Plasma and Welding Emission Limits <sup>(a)</sup>

Source Description	PM		PM <sub>10</sub> <sup>(b)</sup>		PM <sub>2.5</sub> <sup>(b)</sup>		NO <sub>x</sub>	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
CNC Plasma Cutting Machine	6.89E-06	8.96E-06	6.89E-06	8.96E-06	6.89E-06	8.96E-06	0.22	0.28
WeldPro Welding	0.01	0.04	0.01	0.04	0.01	0.04	N/A	N/A

- 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), and two point five (2.5) 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 plasma and welding process through any vent, or any other stack, vent, or functionally equivalent opening associated with the plasma and welding process, 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 Plasma Cutting and Welding Hours Limit**

Separately, Plasma Cutting and Welding shall not exceed 2,600 hours per year, and ten (10) hours per day each.

### **2.6 Welding Rod Type**

The permittee shall use E70C-6M H4 welding electrode rod or alternative equivalent, if the equivalent can be demonstrated that the use of an alternative equivalent welding electrode rod results in emissions equal to or lower than the rod listed in this permit.

### **2.7 Fume Extraction System Operation**

The permittee shall operate a fume extraction system to control emissions from the plasma cutting process. The filter shall have a minimum control efficiency of 99.9% for PM<sub>2.5</sub>/PM<sub>10</sub>. The permittee shall operate the fume extraction system in accordance with the O&M manual.

### **2.8 Closed Shop Doors**

Doors and windows or other openings on buildings at this facility where plasma cutting operations are conducted must be kept closed, except for personnel entering and exiting the building, and may not be propped open or remain open during operation of the plasma cutter and should remain closed for one hour after operation from the time the plasma cutter is finished.

## **Monitoring and Recordkeeping Requirements**

### **2.9 Plasma Cutting and Welding Hours Monitoring**

For each process, each calendar month, the permittee shall monitor and record the number of operational hours by all of the individual cutters for the previous day (hr/day) and for the previous consecutive 12 calendar months (hr/yr) to demonstrate compliance with Plasma Cutting and Welding Hours Limit permit condition. The records shall remain on-site at all times, and shall be made available to DEQ representatives upon request.

### **2.10 Welding Rod Type Monitoring**

The permittee shall keep the safety data sheet (SDS) of welding rods used at the facility to demonstrate compliance with Welding Rod Type permit condition. The records shall remain on-site at all times, and shall be made available to DEQ representatives upon request.

### **2.11 Fume Extraction System Filter Control Efficiency Records**

The permittee shall keep records of the filters used in the fume extraction system to demonstrate compliance with the filter control efficiency requirements specified in Fume Extraction System Operation permit condition. The records shall remain on-site at all times and shall be made available to DEQ representatives upon request.

**2.12 Filter Inspection**

Filters for the fume extraction system shall be checked and replaced as outlined in the O&M Manual. Documentation of the filter replacement shall remain on-site at all times and made available to DEQ representatives upon request.

**2.13 O&M Manual**

Within 60 days of permit issuance, the permittee shall have developed an Operation and Maintenance (O&M) Manual for the fume extraction system according to the manufacturer's specifications and recommendations. The O&M Manual shall describe the procedures that will be followed to ensure that all treatment of 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 operated as efficiently 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.

### 3 Abrasive Blasting

#### 3.1 Process Description

Following steel sizing, the components are cleaned using abrasive blasting. Abrasive blasting occurs inside the main facility building. The semi-automated blasting unit is equipped with a Blast Cleaning Products (BCP) AutoBlast System, and the media used for abrasive blasting is steel shot.

#### 3.2 Control Device Descriptions

**Table 3.1 Abrasive Blasting Description**

Emissions Units / Processes	Control Devices
<u>Semi-Automated Abrasive Blasting:</u> Manufacturer: Blast Cleaning Products (BCP) Model: Autoblaster Max. capacity: 1480 lbs media/minute Manufacture Date: November 1996	<u>Control Device Name:</u> Manufacturer: BCP Model: Donaldson Torit Ultra-Web Cartridge, MERV 15 PM <sub>10/2.5</sub> control efficiency: 90.0% Model: Donaldson Torit Ultra-Web Cartridge, MERV 16 PM <sub>10/2.5</sub> control efficiency: 95.0% Enclosed Building PM <sub>10/2.5</sub> Control Efficiency: 50.0% Manufacture Date: September 2017

### Emission Limits

#### 3.3 Emission Limits

The emissions from the abrasive blasting process shall not exceed any corresponding emissions rate limits listed in Table 3.2.

**Table 3.2 Abrasive Blasting Emission Limits<sup>(a)</sup>**

Source Description	PM <sub>2.5</sub> <sup>(b)</sup>		PM <sub>10</sub> <sup>(b)</sup>	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
Semi-Automated Abrasive Blasting	0.01	0.01	0.10	0.10

- 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 abrasive blasting through any vent, or functionally equivalent opening associated with the abrasive blasting process, 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 Abrasive Blasting Media Usage Limits

- The daily usage of the abrasive blasting media shall not exceed 355.2 ton/day.
- The annual usage of the abrasive blasting media shall not exceed 92,352 ton per 12 consecutive month period.

#### 3.6 Blast Cleaning Products Filtration System Operation

The permittee shall operate a blast cleaning products filtration system to control particulate emissions from the abrasive blasting process. The MERV 15 filter shall have a minimum control

efficiency of 90.0% for PM<sub>2.5</sub>/PM<sub>10</sub>, and the MERV 16 filters shall have a minimum control efficiency of 95.0% for PM<sub>2.5</sub>/PM<sub>10</sub>. The permittee shall operate the blast cleaning products filtration system in accordance with the O&M manual.

### **3.7 Closed Shop Doors**

Doors and windows or other openings on buildings at this facility where abrasive blasting operations are conducted must be kept closed, except for personnel entering and exiting the building, and may not be propped open or remain open during operation of the abrasive blaster and should remain closed for one hour after operation from the time the abrasive blaster is finished.

## **Monitoring and Recordkeeping Requirements**

### **3.8 Abrasive Blasting Media Usage Monitoring**

- Each day, the permittee shall monitor and record the amount of abrasive blasting media used at the facility to demonstrate compliance with the daily usage limit in Abrasive Blasting Media Usage Limits permit condition.
- Each calendar month, the permittee shall monitor and record the amount of abrasive blasting media used at the facility for the previous month (ton/month) and for the previous consecutive 12 calendar months (ton/year) to demonstrate compliance with the annual usage limit in Abrasive Blasting Usage Limits permit condition.

### **3.9 Blast Cleaning Products Filtration System Filter Control Efficiency Records**

The permittee shall keep records of the filters used in the blast cleaning products filtration system to demonstrate compliance with the filter control efficiency requirements specified in Blast Cleaning Products Filtration System Operation permit condition. The records shall remain on-site at all times and shall be made available to DEQ representatives upon request.

### **3.10 Filter Inspection**

Filters for the blast cleaning products filtration system shall be checked and replaced as outlined in the O&M Manual. Documentation of the filter replacement shall remain on-site at all times and made available to DEQ representatives upon request.

### **3.11 O&M Manual**

Within 60 days of permit issuance, the permittee shall have developed an Operation and Maintenance (O&M) Manual for the blast cleaning products filtration system according to the manufacturer's specifications and recommendations. The O&M Manual shall describe the procedures that will be followed to ensure that all treatment of 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 operated as efficiently 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.

## 4 Coating Operations

### 4.1 Process Description

After the raw, plate, and pre-fabricated steel has been cut, cleaned, and constructed, it is placed in an enclosed, side draft paint booth with dry filters, and a heater that is regulated in section 5 of the permit, for the primer and paint application process. The paint booth has two sections, the spraying section and the curing section. Materials are first placed into the spraying section where either primer and/or paint are applied to the constructed product. Application of primer and paint can occur at the same time as there are four high volume low pressure (HVLP) spray guns. Application of primer can occur approximately eight (8) hours per day, while the application of paint coatings can occur approximately ten (10) hours per day. The primer mixture consists of primer, catalyst, and acetone. The paint mixture consists of polyurethane paint, hardener, Q70 (methyl amyl ketone), and accelerator.

The spraying section of the booth is heated with ambient air from the facility; it does not have a dedicated heating unit. Air is circulated in from the main facility building, and exhausts through two stacks to ambient air. The booth is equipped with filters for control of particulate emissions.

The curing section of the spray booth is heated with natural gas. Air from within the curing room is re-circulated back into the heater makeup air, with 80% of the air recirculated and 20% exhausted to ambient air.

### 4.2 Control Device Descriptions

**Table 4.1 Coating Application Description**

Emissions Units / Processes	Control Devices
<u>Paint Booth:</u> Type: Side draft, dry filters Manufacture Date: November 2017  <u>Spray Gun(s):</u> Manufacture: Iwata Model: LPH200 Type: HVLP Transfer Efficiency: 65% Manufacture Date: November 2017	<u>Filter:</u> Manufacturer: Superior Fibers, LLC Model: TGT21--12-OT/PA12 Filter Efficiency: 98.7% Manufacture Date: November 2017

## Emission Limits

### 4.3 Emission Limits

The emissions from the paint booth stack shall not exceed any corresponding emissions rate limits listed in Table 4.2.

**Table 4.2 Paint Booth Emission Limits<sup>(a)</sup>**

Source Description	PM <sub>10/2.5</sub> <sup>(b)</sup>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
Paint Booth	1.35E-01	0.42	N/A	N/A	N/A	N/A	N/A	N/A	30.45	95.02

- 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.

#### 4.4 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.

#### 4.5 Opacity Limit

Emissions from the paint booth stack, or any other stack, vent, or functionally equivalent opening associated with the paint booth, 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

#### 4.6 Coating Material Usage Limits

- The maximum amount of primer used at the facility shall not exceed 32 gallons per day (gal/day), and 8,320 gallons per rolling 12 calendar months period (gal/yr).
- The maximum amount of catalyst used at the facility shall not exceed 8 gallons per day (gal/day), and 2,080 gallons per rolling 12 calendar months period (gal/yr).
- The maximum amount of acetone used at the facility shall not exceed 8 gallons per day (gal/day), and 2,080 gallons per rolling 12 calendar months period (gal/yr).
- The maximum amount of polyurethane paint used at the facility shall not exceed 65 gallons per day (gal/day), and 16,900 gallons per rolling 12 calendar months period (gal/yr).
- The maximum amount of Hardener used at the facility shall not exceed 16.3 gallons per day (gal/day), and 4,238 gallons per rolling 12 calendar months period (gal/yr).
- The maximum amount of Q70 (methyl amyl ketone) used at the facility shall not exceed 8.1 gallons per day (gal/day), and 2,106 gallons per rolling 12 calendar months period (gal/yr).
- The maximum amount of accelerator used at the facility shall not exceed 4.1 gallons per day (gal/day), and 1,066 gallons per rolling 12 calendar months period (gal/yr).

#### 4.7 Coating Material Formulations

The permittee shall only use coating materials listed in Table 4.3 or their respective equivalent coating material. Refer to Appendix A of the S.O.B. for the material components.

For the purposes of this permit condition, “equivalent” is defined as:

- A solid and VOC content of a new paint material, in lb/gal, as listed in the SDS, is equal to or less than the solid and VOC content, as listed in the SDS, of the corresponding paint material listed in Table 4.3, and
- A weight% of metals, HAP, and TAP multiplying the paint density, in lb/gal, as listed in the SDS, of a new paint material, is equal to or less than the weight% of metals, HAP, and TAP multiplying the paint density, in lb/gal, as listed on the SDS, of the corresponding paint material listed in Table 4.3. Using a coating material that contains any additional metal, HAP, or TAP is not an equivalent coating material.

**Table 4.3 Coating Materials**

<b>Product Code</b>	<b>Coating Material Description</b>
SEP63229A	VOC Epoxy Primer
CRE-121	2.1 VOC White Epoxy Primer
CRE-321	2.1 VOC Gray Epoxy Primer
GXM350	Low Cure Catalyst
N/A	Acetone
AUE-370M-1	Custom Tinted DTM Polyurethane
ESH200	Single Stage Hardener
GXH1086	Urethane Hardener
Q70	Methyl Amyl Ketone
UA-11	Urethane Accelerator

**4.8 Paint Booth and Filters Operation**

- The permittee shall install, maintain, and operate a paint booth filter system with a minimum control efficiency of 98.7% for particulate emissions  $\leq 10$  microns as documented by the filter manufacturer according to the O&M Manual.
- All coating activities at this facility shall be conducted inside a paint booth. The filter system shall be operated at all times when the paint booth is operating.

**4.9 Spray Gun Operation**

All primer and paint shall be conducted with a high volume low pressure (HVLP) spray gun, or equivalent technology spray guns with a minimum 65.0% transfer efficiency as documented by the spray gun manufacturer.

**Monitoring and Recordkeeping Requirements**

**4.10 Odor Complaints**

The permittee shall maintain records of all odor complaints received to demonstrate compliance with 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.

**4.11 Coating Material Usage Monitoring**

Each calendar month, the permittee shall monitor and record the amount of primer, catalyst, acetone, polyurethane paint, hardener, methyl amyl ketone, and accelerator used in the previous day for gallons per day (gal/day) and for the previous 12 calendar months (gal/year) to demonstrate compliance with Coating Material Usage Limits permit condition.

**4.12 Coating Material Formulations Monitoring**

For each material used at the facility, the permittee shall record and maintain the following records:

- Material purchase volume records
- Safety Data Sheets (SDS)

For each material not listed in Table 4.3, the permittee shall demonstrate that the new material meets the “equivalent” definition in Permit Condition 4.7.

#### **4.13 Paint Booth Filter Records**

The permittee shall keep records of the paint booth filters used at the facility to demonstrate compliance with the filter system minimum control efficiency requirement specified in Paint Booth and Filters operation permit condition. The records shall remain on-site at all times and shall be made available to DEQ representatives upon request.

#### **4.14 Spray Gun Records**

The permittee shall keep records of the spray guns used at the facility to demonstrate compliance with the minimum transfer efficiency as documented by the spray gun manufacturer as required in the Spray Gun Operation permit condition. The records shall remain on-site at all times and shall be made available to DEQ representatives upon request.

#### **4.15 Filter Inspection**

Filters for the paint booth shall be checked and replaced as outlined in the O&M Manual. Documentation of the filter replacement shall remain on-site at all times and shall be made available to DEQ representatives upon request.

#### **4.16 O&M Manual**

Within 60 days of permit issuance, the permittee shall have developed an Operation and Maintenance (O&M) Manual for the paint booth filtration system according to the manufacturer's specifications and recommendations. The O&M Manual shall describe the procedures that will be followed to ensure that all treatment of 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 operated as efficiently 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.

## 5 Combustion Sources

### 5.1 Process Description

There are three natural gas fired heaters at the facility, two of the heaters are used to heat the main building, and one heater is used in the curing section of the paint booth.

### 5.2 Control Device Descriptions

**Table 5.1 Combustion Source Description**

Emissions Units / Processes	Control Devices
<u>Two (2) HVAC Units:</u> Manufacturer: Titan Model: TA-130 NG VLH AR/80 Heat Input Rate: 2.475 MMBtu/hr Fuel Type: Natural Gas Manufacture Date: September 2017	None
<u>Curing Room Heater:</u> Manufacturer: Trane Model: DFOA118FNAB1ACF13AO ABJLNPY Heat Input Rate: 0.825 MMBtu/hr Fuel Type: Natural Gas Manufacture Date: November 2017	None

## Emission Limits

### 5.3 Emission Limits

The emissions from the combustion stack's shall not exceed any corresponding emissions rate limits listed in Table 5.2.

**Table 5.2 Combustion Source Emission Limits <sup>(a)</sup>**

Source Description	PM <sub>10/2.5</sub> <sup>(b)</sup>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
Two (2) HVAC Units	0.01	0.04	3.00E-03	3.80E-03	0.48	0.63	0.40	0.53	0.02	0.03
Curing Room Heater	1.00E-03	2.00E-03	1.00E-04	1.26E-04	0.02	0.02	0.01	0.02	8.90E-04	1.15E-03

- 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.

### 5.4 Opacity Limit

Emissions from the Combustion stack's, or any other stack, vent, or functionally equivalent opening associated with the combustion sources, 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.

### 5.5 Fuel Burning Equipment

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas.

## **Operating Requirements**

### **5.6 Fuel Usage**

- All heaters shall combust natural gas exclusively.
- Natural gas used by the heater and HVAC units shall not exceed 14.95 million standard cubic feet per consecutive 12 calendar month period (MMscf/yr).

## **Monitoring and Recordkeeping Requirements**

### **5.7 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 (MMscf/month) and for the previous consecutive 12 calendar months (MMscf/yr) to demonstrate compliance with the Fuel Usage permit condition.

## 6 General Provisions

### General Compliance

6.1 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.]

6.2 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]

6.3 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

6.4 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

6.5 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]

6.6 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; and

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

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

## **Performance Testing**

**6.7** 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.

**6.8** 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.

**6.9** 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**

**6.10** 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**

- 6.11 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**

- 6.12 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**

- 6.13 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**

- 6.14 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**

- 6.15 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**

- 6.16 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]