Air Quality

PERMIT TO CONSTRUCT

Permittee Western Trailer Co.

Permit Number P-2016.0058

Project ID 62788

Facility ID 001-00337

Facility Location 6701 Business 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 March 10, 2022

Zach Pierce, Permit Writer

Mike Simon, Stationary Source Bureau Chief
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1 Permit Scope

Purpose

1.1 This is a modified permit to construct (PTC) to install four new heaters and relocate the aluminum welding operation.

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-2016.0058, issued on June 29, 2020.

Regulated Sources

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

<table>
<thead>
<tr>
<th>Permit Section</th>
<th>Source</th>
<th>Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>MAU1 Paint Shop Dry Heater: Manufacturer: Reznor Model: RDF2-120 Manufacture Date: 2002 Heat input rating: 1.5 MMBtu/hr Fuel: Natural Gas</td>
<td>None</td>
</tr>
<tr>
<td>2</td>
<td>MAU2 Paint Shop Wash Bay Heater: Manufacturer: Reznor Model: RDF2-120 Manufacture Date: 2002 Heat Input Rating: 1.5 MMBtu/hr Fuel: Natural Gas</td>
<td>None</td>
</tr>
<tr>
<td>2</td>
<td>MAU3 Paint Booth Heaters: Manufacturer: Viking Model: ANSZ83.4 (2) Manufacture Date: 1998 Heat Input Rating: 5.6 MMBTU/hr Fuel: Natural Gas</td>
<td>None</td>
</tr>
<tr>
<td>2</td>
<td>H1 Building 1 Space Heater: Manufacturer: Reznor Model: FT-30 Manufacture Date: 1998 Heat Input Rating: 0.3 MMBTU/hr Fuel: Natural Gas</td>
<td>None</td>
</tr>
<tr>
<td>2</td>
<td>H2 Building 1 Unit Heaters: Manufacturer: RE-VERBER-RAY Model: DR100 (50) Manufacture Date: 1998 Heat Input Rating: 5.0 MMBTU/hr total Fuel: Natural Gas</td>
<td>None</td>
</tr>
<tr>
<td>2</td>
<td>H3 Building 1 Tool Room Furnace: Manufacturer: Bryant Model: Indirect-Fired Manufacture Date: 1998 Rating: 0.046 MMBTU/hr Fuel: Natural Gas</td>
<td>None</td>
</tr>
<tr>
<td>Permit Section</td>
<td>Source</td>
<td>Control Equipment</td>
</tr>
<tr>
<td>----------------</td>
<td>--------</td>
<td>-------------------</td>
</tr>
</tbody>
</table>
| 2              | H4 Building 1 Office Furnaces:  
Manufacturer: Bryant  
Model: Indirect-Fired  
Manufacture Date: 1998  
(5) Heat Input Rating: 0.575 MMBTU/hr total  
Fuel: Natural Gas | None |
| 2              | H5 Building 8 Unit Heaters:  
Manufacturer: Reznor  
Model: FE250-H Direct-Fired  
Manufacture Date: 2001  
(2) Heat Input Rating: 0.42 MMBTU/hr total  
Fuel: Natural Gas | None |
| 2              | H6 Building 8 Training Room Furnace:  
Manufacturer: Trane  
Model: TUE100A948K2  
Manufacture Date: 1999  
Heat Input Rating: 0.10 MMBTU/hr  
Fuel: Natural Gas | None |
| 2              | H7 Building 10 Welding Area Unit Heaters:  
 Manufacturer: RE-VERBER-RAY  
Model: DR100  
Manufacture Date: 1998  
(8) Heat Input Rating: 0.8 MMBTU/hr total  
Fuel: Natural Gas | None |
| 2              | H8 Building 10 Machine Shop Area Unit Heaters:  
Manufacturer: Modine  
Model: PDP125AED130  
Manufacture Date: 2005  
(3) Heat Input Rating: 0.375 MMBTU/hr total  
Fuel: Natural Gas | None |
| 2              | H9 Building 10 Office Furnaces:  
Manufacturer: Bryant  
Model: Plus 90  
Manufacture Date: 2005  
(2) Heat Input Rating: 0.12 MMBTU/hr total  
Fuel: Natural Gas | None |
| 2              | H10 Blast Building Heaters:  
Manufacturer: Reznor  
Model: UDAS-300  
Manufacture Date: 1998  
(2) Heat Input Rating: 0.60 MMBTU/hr total  
Fuel: Natural Gas | None |
| 2              | H11 Building 1 Addition Heaters:  
Manufacturer: Space-Ray  
Model: RSCA10-N5B  
Manufacture Date: 2021  
(4) Heat Input Rating: 0.416 MMBTU/hr total  
Fuel: Natural Gas | None |
| 3              | MB1 Media Blast:  
Manufacturer: CLEMCO  
Model: 3661  
Manufacture Date: 1998  
Max. Capacity: 10 ft³ | F1 Filter:  
Manufacturer: CAMFILL FARR  
Model: GS-20  
Filter efficiency: 99.7% |
| 4              | Welders (84):  
Manufacturer: Lincoln, Miller, Hypermax  
Types: Mig/Tig, GMAW, SMAW, plasma  
Manufactured: 1998-2014 | None |
<table>
<thead>
<tr>
<th>Permit Section</th>
<th>Source</th>
<th>Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td>R1 Multicam Router: Manufacturer: Multicam Model: 5500 Manufacture Date: 1998</td>
<td>T1 Cyclone Bag Dust Collector: Manufacturer: Donaldson Torit Model: GS20 Filter Efficiency: 99.9%</td>
</tr>
<tr>
<td>4</td>
<td>R2 Komo Router: Manufacturer: Komo Model: M2 512S SHO Manufacture Date: 1998</td>
<td>T2 Cyclone Bag Dust Collector: Manufacturer: Donaldson Torit Model: DFT 3-18 Filter Efficiency: 99.9%</td>
</tr>
<tr>
<td>4</td>
<td>S1 Aluminum Saw: Manufacturer: SOCO Model: M2MC-260N/FA Manufacture Date: 1998</td>
<td>T3 Cyclone Bag Dust Collector: Manufacturer: Donaldson Torit Model: GS20-5 Filter Efficiency: 99.9%</td>
</tr>
<tr>
<td>4</td>
<td>D1 Deburring Machines (2): Manufacturer: COSTA Model: MD4CVC1150 Manufacture Date: 2015/2016 Max. Capacity: approx. 10,000 lb/day</td>
<td>T4 Downflow II: Manufacturer: Donaldson Torit Model: DFT 3-18 Filter Efficiency: 95%</td>
</tr>
<tr>
<td>5</td>
<td>SR1 Solvent Recycling: Manufacturer: Becca Model: 9725 Manufacture Date: 1998 6 gallon usable capacity</td>
<td>None</td>
</tr>
</tbody>
</table>

[3/10/2022]
2 Combustion Sources

2.1 Process Description

There are 14 natural gas-fired combustion sources at the facility utilized for building heat, booth heat, and drying surfaces.

2.2 Control Device Descriptions

<table>
<thead>
<tr>
<th>Emissions Units / Processes</th>
<th>Control Devices</th>
<th>Emission Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>MAU1 Paint Shop Dry Heater</td>
<td>None</td>
<td>Paint R1</td>
</tr>
<tr>
<td>MAU2 Paint Shop Wash Bay Heater</td>
<td>None</td>
<td>Paint R2</td>
</tr>
<tr>
<td>MAU3 Paint Booth Heaters</td>
<td>None</td>
<td>Paint V1-6</td>
</tr>
<tr>
<td>H1 Building 1 Space Heater (H1)</td>
<td>None</td>
<td>BLD1D6</td>
</tr>
<tr>
<td>H2 Building 1 Unit Heaters (H2)</td>
<td>None</td>
<td>BLD1 window and doors</td>
</tr>
<tr>
<td>H3 Building 1 Tool Room Furnace (H3)</td>
<td>None</td>
<td>BLD1 D7</td>
</tr>
<tr>
<td>H4 Building 1 Office Furnaces (H4)</td>
<td>None</td>
<td>BLD1 D8-D12</td>
</tr>
<tr>
<td>H5 Building 8 Unit Heaters (H5)</td>
<td>None</td>
<td>BLD8 D2-D3</td>
</tr>
<tr>
<td>H6 Building 8 Training Room Furnace (H6)</td>
<td>None</td>
<td>BLD8 D4</td>
</tr>
<tr>
<td>H7 Building 10 Welding Area Unit Heaters (H7)</td>
<td>None</td>
<td>BLD10 doors and vents</td>
</tr>
<tr>
<td>H8 Building 10 Machine Shop Area Unit Heaters (H8)</td>
<td>None</td>
<td>BLD10 D2-D4</td>
</tr>
<tr>
<td>H9 Building 10 Office Furnaces (H9)</td>
<td>None</td>
<td>BLD10 D5-D6</td>
</tr>
<tr>
<td>H10 Blast Building Heaters (H10)</td>
<td>None</td>
<td>BLST1-2</td>
</tr>
<tr>
<td>H11 Building 1 Addition Heaters (H11)</td>
<td>None</td>
<td>BLD1A D1-D4</td>
</tr>
</tbody>
</table>

Emission Limits

2.3 Opacity Limit

Emissions from the MAU1-3 and H1-H11 stack, 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.

Operating Requirements

2.4 Fuel Usage

The rolling 12 calendar month natural gas used by the facility shall not exceed 44.17 million standard cubic feet per year (MMscf/yr). The make-up air units (MAU1 and MAU2), paint booth heater (MAU3), and building heaters (H1 through H11) shall only combust natural gas fuel.
Monitoring and Recordkeeping Requirements

2.5 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 in standard cubic feet per month. Natural gas usage shall be determined by summing the monthly natural gas usage over the previous consecutive 12-month period to demonstrate compliance with the Fuel Usage limit.
3 Abrasive Blasting

3.1 Process Description

Abrasive Blasting is performed to prepare surfaces for coating in an enclosed Blast Building. The process uses a 10-cubic foot blast machine, initially charged with 40,000 lbs. of Amasteel abrasive.

3.2 Control Device Descriptions

Table 3.1 Abrasive Blasting Description

<table>
<thead>
<tr>
<th>Emissions Units / Processes</th>
<th>Control Devices</th>
<th>Emission Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>CLEMCO Media Blast – MB1</td>
<td>FARR Baghouse - 99.7% filter efficiency</td>
<td>F1 exhaust</td>
</tr>
</tbody>
</table>

Emission Limits

3.3 Emission Limits

The PM or PM$_{10}$ emissions from the MB1 stack shall not exceed 0.2773 tons per year (T/yr) as determined by a rolling 12-month period.

3.4 Opacity Limit

Emissions from the MB1 stack, or any other stack, vent, or functionally equivalent opening associated with the abrasive blasting, 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

Annual spraying of abrasive blasting media, including Amasteel Abrasive or equivalent media with equal or lesser amount of individual TAP or HAP pollutants shall not exceed 4,160 hours of spraying per any consecutive 12-month period.

3.6 Abrasive Blasting Cartridge Filter Control Requirements

The permittee shall operate a cartridge filter to control PM and PM$_{10}$ emissions from the MB1.

3.7 O&M Manual

The permittee shall have developed an Operation and Maintenance (O&M) Manual for the cartridge filter. 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 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.
Monitoring and Recordkeeping Requirements

3.8 Abrasive Blasting Media Monitoring

Each calendar month, the permittee shall monitor and record the operating hours of spray gun abrasive media blasting performed by the facility for the previous month in hours per month. Operating hours of spray gun abrasive media blasting shall be determined by summing the monthly operating hours of spray gun abrasive media blasting over the previous consecutive 12-month period to demonstrate compliance with the Abrasive Blasting Media Usage limit.
4 Assembly Operations

4.1 Process Description

Welding is performed at various stations in Building 1. Welding is primarily Gas Metal Arc Welding (GMAW) and submerged Arc Welding (SAW) with carbon steel wire, concentrated in the southeast quadrant of the building. GMAW and MIG/TIG welding using aluminum wire is performed at Building 1 as well. GMAW welding with carbon steel wire and stainless steel wire is performed at Building 10. There are approximately 85 welders.

Metal cutting is performed on automated routers at Building 1 and a saw at Building 10, primarily on aluminum. Operations are dry and emissions are controlled by a Torit Cyclone 20-5 with filter bags. Metal cutting at Building 1 is performed on two automated router machines, a MultiCam and a Komo. The MultiCam discharges emissions to a Torit located outside the building. The Komo discharges emissions to a Torit 20-5 located inside the building. Metal cutting at Building 10 is performed on a saw manufactured by SOCO. The saw discharges emissions to a Torit 20-5 located outside the building.

Surface burrs and edge imperfections are removed from steel using two Costa MD4CVC1150 machines. Operations are dry and emissions are controlled by a Donaldson Torit Downflow II DFT 3-18 filter unit located outside the building.

4.2 Control Device Descriptions

<table>
<thead>
<tr>
<th>Emissions Units / Processes</th>
<th>Control Devices</th>
<th>Emission Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Welding</td>
<td>None</td>
<td>Building 1 and 10 vents</td>
</tr>
<tr>
<td>Routing</td>
<td>Cyclone bag dust collector</td>
<td>T2 exhaust</td>
</tr>
<tr>
<td>Aluminum sawing</td>
<td>Cyclone bag dust collector</td>
<td>T3 exhaust</td>
</tr>
<tr>
<td>Deburring</td>
<td>Filter</td>
<td>T4 exhaust</td>
</tr>
<tr>
<td></td>
<td>Donaldson Torit Downflow II Filter</td>
<td>Filter efficiency: 95%</td>
</tr>
</tbody>
</table>

[3/10/2022]

Emission Limits

4.3 Opacity Limit

Emissions from each of the Building 1 vents, Torit 20-5, of DFT 3-18 stack, or any other stack, vent, or functionally equivalent opening associated with the assembly 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

4.4  Welding Material Usage Limit

The maximum amount of the welding electrode materials used shall not exceed the following types and amounts or equivalent per rolling 12-month period for each building:

Table 4.2 Welding Rod Limits by Type and Building

<table>
<thead>
<tr>
<th>Type</th>
<th>Building 1 lbs/year</th>
<th>Building 10 lbs/year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Steel</td>
<td>90,304</td>
<td>51,704</td>
</tr>
<tr>
<td>Stainless Steel</td>
<td>368</td>
<td>2,335</td>
</tr>
<tr>
<td>Aluminum</td>
<td>13,352</td>
<td>0</td>
</tr>
</tbody>
</table>

4.5  Dust Collector Operation

The permittee shall operate a dust collector to control emissions from the routers R1 and R2, the aluminum saw S1, and deburring in accordance with the O&M manual.

Monitoring and Recordkeeping Requirements

4.6  Welding Rod Usage Monitoring

Each calendar month, the permittee shall monitor and record the amount of welding electrode material used by the facility for the previous month in pounds per month. Welding electrode usage shall be determined by summing the monthly welding electrode usage over the previous consecutive 12-month period to demonstrate compliance with the Welding Material Usage Limit permit condition.

4.7  Filter Inspection

Filters for the filtration system for the routers and aluminum saw 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.

4.8  O&M Manual

The permittee shall have developed an Operation and Maintenance (O&M) Manual for the cyclone bag dust collector. 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 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 Coating Application

5.1 Process Description

Paint is sprayed on metal in a totally enclosed spray booth inside the east-side of the Paint Booth Building. Approximately seven truck trailers are painted each operating day. The booth is a side-draft style with 6 exhaust fans and 2 banks of exhaust filters. Clean air is drawn in through ATI 600 filters in the top of the booth and exhausted out the filters at the Ultra II/Ultra filters at the sides of the booth. A wash room occupies the west-side of the Paint Booth Building. A drying room occupies the remainder of the east-side of the Paint Booth Building. The heat for drying is provided by electrically powered infra-red heaters.

Used Dupont 105 cleaning solvent is recycled in a 6-gallon Becca Model 9725 solvent distillation unit located in the Paint Storage Building. Approximately, 5-10 gallons of used solvent is generated and recycled each day. The unit is generally operated once per day and yields approximate 95% of useable solvent.

5.2 Control Device Descriptions

<table>
<thead>
<tr>
<th>Emissions Units / Processes</th>
<th>Control Devices</th>
<th>Emission Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paint Booth</td>
<td>Spray Guns:</td>
<td>Paint V1-6</td>
</tr>
<tr>
<td></td>
<td>Graco G-40 air assisted airless HVLP</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Transfer efficiency: 85% Graco Pro XP 85 electrostatic Transfer efficiency 85% Filter: UltraII/Ultra Filter efficiency: 99.90% combined</td>
<td></td>
</tr>
<tr>
<td>Solvent Recycling</td>
<td>None</td>
<td>Paint Storage BLD vents</td>
</tr>
</tbody>
</table>

Emission Limits

5.3 Emission Limits

The emissions from the Paint Booth stack shall not exceed any corresponding emissions rate limits listed in Table 5.2.

<table>
<thead>
<tr>
<th>Source Description</th>
<th>PM10(a)</th>
<th>VOC</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>lb/hr</td>
<td>T/yr</td>
</tr>
<tr>
<td>Paint Booth</td>
<td>0.004</td>
<td>13.94</td>
</tr>
<tr>
<td></td>
<td>0.008</td>
<td>29.00</td>
</tr>
</tbody>
</table>

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 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.

5.5 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

5.6 Coating Material Usage Limits

The maximum amount of all coating materials used at the facility shall not exceed 17,494.9 gallons per rolling 12-calendar month period.

5.7 Coating Material Formulations

The permittee shall use only the HAP-, TAP-, and VOC-containing coating materials listed in Table 5.3 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 is demonstrated to result in emissions lower than the Paint Booth Emission Limits (Table 5.2), and result in emissions lower than all emission screening levels for toxic air pollutants (TAP) provided in IDAPA 58.01.01.585-586.

Table 5.3 Coating Materials

<table>
<thead>
<tr>
<th>Manufacturer</th>
<th>Coating Material Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Akzo Nobel</td>
<td>LV260 Primer</td>
</tr>
<tr>
<td>Akzo Nobel</td>
<td>LV260 Epoxy Primer Hardener Fast</td>
</tr>
<tr>
<td>Akzo Nobel</td>
<td>Reducer LV260-Slow</td>
</tr>
<tr>
<td>Akzo Nobel</td>
<td>SRA Strong Reducer</td>
</tr>
<tr>
<td>Akzo Nobel</td>
<td>UTE Tint Composite</td>
</tr>
<tr>
<td>Akzo Nobel</td>
<td>UTE 350 Binder</td>
</tr>
<tr>
<td>Akzo Nobel</td>
<td>UTE 99 Reducer</td>
</tr>
<tr>
<td>Akzo Nobel</td>
<td>UTE 280/350 Hardener</td>
</tr>
<tr>
<td>Akzo Nobel</td>
<td>998 Accelerator</td>
</tr>
<tr>
<td>Akzo Nobel</td>
<td>UTE 350 RM 99U Black</td>
</tr>
<tr>
<td>Akzo Nobel</td>
<td>UTE 280/350 Hardener-Topcoat</td>
</tr>
<tr>
<td>Akzo Nobel</td>
<td>UTE R200 Reducer</td>
</tr>
</tbody>
</table>

5.8 Spray Gun and Filter Operation

The permittee shall install, maintain, and operate each filter system in accordance with manufacturer’s specifications. The corresponding filter system shall be operated at all times when the paint spray booth is operating. Any period of time that the paint spray booth is in operation while the corresponding filter 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. All coating activities at this facility shall be conducted inside a paint spray booth with filter system in place and exhaust fans operating.
All painting shall be conducted with air-assisted airless, airless, HVLP, or equivalent technology, with a minimum 75% 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 with a minimum control efficiency of 99.9% for particulate emissions as documented by the filter manufacturer.

5.9 O&M Manual

The permittee shall have developed an Operation and Maintenance (O&M) Manual for the paint booth filtration and solvent recovery 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 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.

Monitoring and Recordkeeping Requirements

5.10 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.

5.11 Paint Spray Booth Emission Monitoring

The permittee shall maintain records onsite demonstrating that emissions from coating operations do not exceed limits in Table 5.2 and do not exceed all emission screening levels in IDAPA 58.01.01.585–586 (Sections 585 and 586). Emissions shall be evaluated on a pollutant-by-pollutant basis.

- Each week that coatings are used, the permittee shall monitor and record the amount of each coating material used in all paint spray booths in gallons per week (gal/week).
- Each calendar month, the permittee shall monitor and record the amount of each coating material used in all paint spray booths for the previous month in gallons per month (gal/mo) and for the previous 12 calendar months (gal/yr).
- Each week, the permittee shall monitor and record emissions from all paint spray booths of each Section 585 TAP emitted in average pounds per hour over the 168-hour weekly averaging period (lb/hr). Each average emission rate (lb/hr) shall be compared to the relevant screening emission level (EL) to determine compliance with Section 585 TAP Paint Spray Booth Emission Limits.
- Each calendar month, the permittee shall monitor and record emissions from all paint spray booths of each Section 586 TAP emitted 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 average pounds per hour over the 12 calendar month averaging period (lb/hr). Each average emission rate (lb/hr) shall be compared to the relevant EL to determine compliance with Section 586 TAP Paint Spray Booth Emission Limits. For emissions in excess of TAP EL, the permittee shall comply with excess emission procedures and requirements included in the General
Provisions of this permit.

- Each calendar month, the permittee shall monitor and record emissions from all paint spray booths of VOC, and PM$_{10}$ emitted in tons per month for the previous month (T/mo), and tons per year for the previous 12 calendar month period (T/yr) to demonstrate compliance with VOC, and PM$_{10}$ Paint Spray 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 emission calculations shall be maintained onsite.

5.12 **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 volume records
- Safety Data Sheets (SDS)

5.13 **Filter Inspection**

Filters for the filtration system for the paint booth 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.
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]

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]

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]

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]

- 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]

**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]

**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]
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]

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]

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]

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]

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]

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]