



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 N Hilton Street, Boise, ID 83706
(208) 373-0502

Brad Little, Governor
Jess Byrne, Director

June 14, 2021

Ray White, Co-Owner
Criterion Trailers LLC
20394 Pinto Ln
Caldwell, ID 83607

RE: Facility ID No. 027-00145, Criterion Trailers LLC, Caldwell
Final Permit Letter

Dear Mr. White:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2014.0026 Project 62582 to Criterion Trailers LLC located at Caldwell for revision to remove several emission units. 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 February 17, 2021.

This permit is effective immediately and replaces PTC No. P-2014.0026 issued on November 16, 2018. This permit does not release Criterion Trailers LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard, Boise, ID 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with David Luft, Air Quality Manager, at (208) 373-0201 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

Mr. White
June 14, 2021
Page 2

contested case, I encourage you to contact Aaron Hoberg at (208) 373-0502 or aaron.hoberg@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script that reads "Mike Simon".

Mike Simon
Stationary Source Bureau Chief
Air Quality Division

MS\ajh

Permit No. P-2014.0026 PROJ 62582

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Criterion Trailers LLC
Permit Number P-2014.0026
Project ID 62582
Facility ID 027-00145
Facility Location 20394 Pinto Lane
Caldwell, Idaho 83606

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 June 14, 2021



Aaron Hoberg, Permit Writer



Mike Simon, Stationary Source Bureau Chief

Contents

1	Permit Scope.....	3
2	HAP & TAP Emissions Sources - Including Metal Fabrication & Painting.....	4
3	General Provisions.....	6

1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) to remove several emission units. The facility will continue to use paint booths, welding equipment, and the boiler for heat.
- 1.2 This PTC replaces Permit to Construct No. P-2014.0026 issued on November 16, 2018.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
-	Boiler – 0.15 MMBtu/hr Natural Gas Fired	None
2	Welding Operations – various equipment	3 or more sided enclosure
2	Spray Painting Operations	Booths with filters

[6/14/2021]

2 HAP & TAP Emissions Sources - Including Metal Fabrication & Painting

2.1 Process Description

Criterion Trailers LLC is engaged in the manufacturing of a wide variety of enclosed cargo and open deck utility trailers. The facility includes welding operations, painting, and a boiler. These emissions source emit both toxic air pollutants (TAPs) and hazardous air pollutants (HAPs).

[6/14/2021]

2.2 Control Device Descriptions

Particulate matter emissions from welding operations are controlled by operating in a 3 or more sided enclosure.

Particulate matter emissions from spray painting operations are controlled by conducting operations within booths equipped with filters.

[6/14/2021]

Emission Limits

2.3 Toxic Air Pollutant (TAP) Limits

Each calendar day emissions of TAPs from the facility, including but not limited to TAPs emissions from paints, thinner, welding, and boiler shall not exceed the EL (lb/hr) multiplied by 24 (for TAPs listed in both IDAPA 58.01.01.585 and 586) or the acceptable ambient concentration (mg/m^3) (for TAPs listed in IDAPA 58.01.01.585) and the acceptable ambient concentration for carcinogens ($\mu\text{g}/\text{m}^3$) (for TAPs listed in IDAPA 58.01.01.586).

[6/14/2021]

2.4 Hazardous Air Pollutant (HAP) Limits

Emissions of any single Hazardous Air Pollutant (HAP) from the entire facility shall not equal or exceed 10 tons per any consecutive 12-calendar month period.

Emissions of any combination of HAPs from the entire facility shall not equal or exceed 25 tons per any consecutive 12-calendar month period.

Operating Requirements

2.5 Particulate matter emissions from welding operations shall be controlled by operating in a 3 or more sided enclosure.

[6/14/2021]

2.6 Particulate matter emissions from spray painting operations shall be controlled by conducting operations within booths equipped with filters guaranteed by the manufacture to remove at least 95.56% of the particulate matter emitted from spray painting operations.

2.7 The permittee shall not use more than 22,000 gallons of paint in any 12 consecutive calendar months.

Monitoring and Recordkeeping Requirements

2.8 Material Usage Records

The permittee shall monitor and record daily the usage of all HAP and TAP containing materials that emit air pollution including but not limited to paints, thinners, and welding rod.

[6/14/2021]

2.9 TAPs Emissions Monitoring Requirements

Using the material usage records, the permittee shall monitor and record the individual TAP (as listed in IDAPA 58.01.01.585 and 586) emissions from the facility in order to demonstrate compliance with the TAPs emissions limits in Permit Condition 2.3. All emissions calculations shall be maintained on-site in accordance with General Provision 3.10.

If any of the individual daily TAP emission rate exceeds 24 times the screening emissions level (EL) specified in IDAPA 58.01.01.585 and 586, a modeling analysis shall be conducted to demonstrate compliance with the acceptable ambient concentration (mg/m³) (for TAPs listed in IDAPA 58.01.01.585) or the acceptable ambient concentration for carcinogens (µg/m³) (for TAPs listed in IDAPA 58.01.01.586). Documentation of all calculations and modeling analysis shall be maintained on-site in accordance with General Provision 3.10.

- 2.10** Using the material usage records, each month the permittee shall monitor and record the individual and total HAP emissions from the facility in order to demonstrate compliance with the HAP emissions limits in Permit Condition 2.4. All emissions calculations shall be maintained on-site in accordance with General Provision 3.10.
- 2.11** The permittee shall maintain on-site and make available to DEQ representatives upon request a manufacturer's guarantee that the filters in booths, where spray painting operations occur, remove at least 95.56% of the particulate matter emitted from spray painting operations.

Reporting Requirements

- 2.12** Each year the permittee shall submit a report by May 1st on all TAP modeling analyses that have been conducted during the previous 12 month period. The report shall document the analyses with sufficient detail, including documentation of all calculations and electronic copies of modeling files, so that DEQ can verify the analysis. The report shall be sent to:

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

The report shall be titled: Criterion Trailers LLC – Permit Required Modeling Report.

2.13 Excess Emissions

If a TAP modeling analysis (conducted pursuant to Permit Condition 2.9) shows that emissions of any TAP exceeds the acceptable ambient concentration for any TAP, the permittee shall follow the excess emissions requirements of IDAPA 58.01.01.131 including but not limited to correcting the excess emission condition in accordance with IDAPA 58.01.01.132, and submitting excess emission reports no later than 15 days after the beginning of each such event in accordance with IDAPA 58.01.01.135.

3 General Provisions

General Compliance

- 3.1 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.]
- 3.2 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, 5/1/1994]
- 3.3 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, 5/1/1994]

Inspection and Entry

- 3.4 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

- 3.5 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, 5/1/1994]
- 3.6 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, 5/1/1994]

- 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, 5/1/1994]

Performance Testing

3.7 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.

3.8 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.

3.9 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, 4/5/2000 and 4/11/2015]

Monitoring and Recordkeeping

3.10 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, 5/1/1994]

Excess Emissions

3.11 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, 4/5/2000]

Certification

- 3.12** 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, 5/1/1994]

False Statements

- 3.13** 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, 3/23/1998]

Tampering

- 3.14** 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, 3/23/1998]

Transferability

- 3.15** This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/2006]

Severability

- 3.16** 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, 5/1/1994]