

Air Quality

PERMIT TO CONSTRUCT

Permittee	Guerdon, LLC
Permit Number	P-2014.0018
Project ID	63122
Facility ID	001-00299
Facility Location	5556 S Federal Way Boise, ID 83716

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued July 18, 2023

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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) to change the facility name from Guerdon Enterprises, LLC to Guerdon, LLC.
- 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-2014.0018, issued on September 2, 2014.

[7/18/2023]

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Wood & Sheet Rock Cutting/Working Operations (e.g. 5 stationary saws, various hand saws, sanding)	Cyclone, filter, or limit operations to occur in an enclosed building
3	TAP (Toxic Air Pollutant) Emission Sources-Spray Guns, Adhesives, Caulk, Foam Insulation, etc.	Particulate TAP – Operations occur in an enclosed building

2 Wood & Sheet Rock Cutting/Working Operations

2.1 Process Description

Modular buildings are constructed within an enclosed building. Operations include cutting and sanding of wood and sheet rock. Ten stationary saws are used.

2.2 Control Device Descriptions

Emissions from cutting, sanding or otherwise shaping wood or sheet rock are controlled by limiting operations within an enclosed building, routing emissions through a filter, or routing emissions to a cyclone.

Emission Limits

2.3 Opacity Limit

Emissions from the wood & sheet rock cutting/working operations stack, or any other stack, vent, or functionally equivalent opening associated with the wood & sheet rock cutting/working operations, must 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 must be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.4 Production Limits

The permittee must not produce more than 5,870 square feet of modular building(s) per calendar day.

The permittee must not produce more than 910,000 square feet of modular buildings per any consecutive 12-month period.

2.5 Emission Control Requirement

Emissions from cutting, sanding or otherwise shaping wood or sheet rock must be controlled by limiting operations within an enclosed building, routing emissions through a filter, or routing emissions to a cyclone.

2.6 Cyclone Bin

All reasonable precautions must be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651. Some of the reasonable precautions may include, but are not limited to, the following: installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials.

Monitoring and Recordkeeping Requirements

2.7 Production

Each day the permittee must monitor and record the square feet of modular building(s) that are produced calendar day.

Each calendar month the permittee must determine and record the square feet of modular buildings produced during the previous 12 consecutive month period.

2.8 Fugitive Emissions

The permittee must conduct a monthly facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee must take corrective action as expeditiously as practicable. The permittee must maintain records of the results of each fugitive emissions inspection. The records must include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

3 TAP Emissions Sources – Including Paint, Adhesive, Caulk and Foam Insulation Usage

3.1 Process Description

Modular buildings are constructed within an enclosed building. Operations include painting, caulking, gluing, and application of spray foam insulation.

3.2 Control Device Descriptions

Emissions from spray painting are controlled by limiting operations to within an enclosed building.

Emission Limits

3.3 Toxic Air Pollutant (TAP) Limits

Each calendar day emissions of TAPs from the facility, including but not limited to TAPs emissions from paints, foam, thinner, adhesives, and caulk must 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/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).

3.4 Reserved

Operating Requirements

3.5 Spray Painting

Spray painting operations must occur within an enclosed building and the permittee must only paint building components that are assembled at the facility.

3.6 MeCl

The permittee must not use methylene chloride (MeCl) to remove dried paint.

3.7 40 CFR 63 Subpart HHHHHH Requirement

The permittee must not perform spray application of coatings that contain chromium, lead, manganese, nickel, or cadmium, to a plastic and/or metal substrate on a part or product as those terms are defined at 40 CFR 63 Subpart HHHHHH (Paint Stripping and Miscellaneous Surface Coating Operations MACT).

Monitoring and Recordkeeping Requirements

3.8 Material Usage Records

The permittee must monitor and record daily the usage of all TAP containing materials, that emit air pollution, that are used in the modular building manufacturing process including but not limited to paints, foam, thinner, adhesives and caulk.

3.9 TAPs Emissions Monitoring Requirements

Using the material usage records, the permittee must monitor and record the individual TAP (as listed in IDAPA 58.01.01.585 and 586) emissions from the process in order to demonstrate compliance with the TAPs emissions limits Permit Condition. All emissions calculations must remain on-site in accordance with General Provision 4.10.

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 must be conducted to demonstrate compliance with the acceptable ambient concentration (mg/m^3) (for TAPs listed in IDAPA 58.01.01.585) or the acceptable ambient concentration for carcinogens ($\mu\text{g}/\text{m}^3$) (for TAPs listed in IDAPA 58.01.01.586). Documentation of all calculations and modeling analysis must be maintained on-site in accordance with General Provision 4.10.

3.10 Reserved

3.11 Excess Emissions

If TAP modeling analysis (such as that conducted pursuant to Permit Condition 3.9) shows that emissions of any TAP exceeds the acceptable ambient concentration for any TAP the permittee must 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.

3.12 Reporting

Each year the permittee must submit a report by May 1st on all TAP modeling analyses that have been conducted during the previous 12-month period. The report must 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 must be sent to:

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

The report must be titled: Guerdon, LLC – Permit Required Modeling Report.

4 General Provisions

General Compliance

4.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein must 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, must constitute a violation of this permit, the “Rules for the Control of Air Pollution in Idaho,” and the Environmental Protection and Health Act (Idaho Code §39-101, et seq).

[Idaho Code §39-101, et seq.]

4.2 The permittee must 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]

4.3 Receiving a permit to construct, a Tier I operating permit, a Tier II operating permit, a Permit by Rule, or a Certificate of Registration for portable equipment does not relieve any owner or operator of the responsibility to comply with all applicable local, state and federal statutes, rules and regulations.

[IDAPA 58.01.01.108]

Inspection and Entry

4.4 Upon presentation of credentials, the permittee must allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

4.5 The Department may cancel a permit to construct if the construction is not begun within two (2) years from the date of issuance, or if during the construction, work is suspended for one (1) year.

[IDAPA 58.01.01.211.02]

4.6 The permittee must 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 must 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 (15) days after such date.

[IDAPA 58.01.01.211.03]

Performance Testing

4.7 If performance testing (air emissions source test) is required by this permit, the permittee must provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

4.8 All performance testing must 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 must include a description of the test method(s) to be used, an explanation of any unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

4.9 Within 60 days of the completion of field sample collection for the performance test required by this permit, the permittee must submit to DEQ a performance test report. The report must 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

4.10 The permittee must maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records must 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 must 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 must be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211]

Excess Emissions

- 4.11** The permittee must comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 must govern in the event of conflicts between the excess emissions general provisions and the regulations of IDAPA 58.01.01.130-136.

During an excess emissions event, the permittee must, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and must, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132]

- 4.12** In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the permittee must demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

- Ensure that no scheduled startup, shutdown, or maintenance resulting in excess emissions occurs during any period in which an Air Quality Advisory has been declared by DEQ.
- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the permittee demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
- Reporting and recording the information required pursuant to the excess emissions reporting and recordkeeping requirements and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133]

- 4.13** In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the permittee must demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

- Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
- Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification must identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification must be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
- Report and record the information required pursuant to the excess emissions reporting and recordkeeping facility wide conditions and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

- During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ must be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

[IDAPA 58.01.01.134]

- 4.14 The permittee must submit a written report to DEQ for each excess emissions event, no later than 15 days after the beginning of such an event. Each report must contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135]

- 4.15 The permittee must maintain excess emissions records at the facility for the most recent five calendar-year period. The excess emissions records must all be made available to DEQ upon request and must include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

- An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and
- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the permittee in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136]

Certification

- 4.16 All documents submitted to DEQ including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification must contain a certification by a responsible official. The certification must 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

- 4.17 No person must 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

- 4.18 Persons are prohibited from knowingly interfering with 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

- 4.19 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.05.

[IDAPA 58.01.01.209.05]

Severability

- 4.20** 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, must not be affected thereby.

[IDAPA 58.01.01.211]