



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

February 23, 2004

Certified Mail No. 7000 1670 0013 9128 8144

Brian Schroeder
Michael's of Oregon Co.
2100 S. Silverstone Way
Meridian, ID 83642

RE: Facility ID No. 001-00193, Michael's of Oregon Co., Meridian
Final Permit Letter

Dear Mr. Schroeder:

On June 30, 2003, the Department of Environmental Quality (DEQ) received a permit to construct (PTC) application from Michael's of Oregon Co. to increase production of Hoppes No. 9 gun-cleaning solvent and bluing chemical. Based on review of the PTC application and IDAPA 58.01.01.200 through 228, the DEQ finds this project meets the provisions of the *Rules for the Control of Air Pollution in Idaho*. Enclosed is modified PTC No. P-030042. This PTC supersedes PTC No. 001-00193, issued December 16, 2002.

Michael's of Oregon Co. satisfied the PTC application fee requirement by submitting a PTC application fee of \$1,000 at the time the PTC application was submitted. Michael's of Oregon Co. also submitted the PTC processing fee of \$1,000 required by IDAPA 58.01.01.225 for an increase in emissions less than one ton per year.

This permit does not release Michael's of Oregon Co. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. Please refer to the appropriate permit number when submitting reports required in the Reporting Requirements section of the permit.

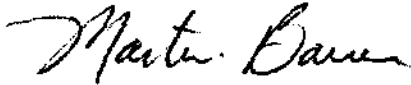
Tim Trumbull of the Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. In addition to your facility's plant manager, DEQ recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the 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 call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Michael's of Oregon
Final PTC, February 23, 2004
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If you have any questions about the enclosed permit or the permitting process, please contact Bill Rogers at (208) 373-0502 or wrogers@deq.state.id.us.

Sincerely,



Martin Bauer, Administrator
Air Quality Division

MB/VAG/sd Permit No. P-030042

Enclosures

c: Tim Trumbull, Boise Regional Office
 Bill Rogers, Permit Coordinator
 Laurie Kral, US EPA Region 10



**Air Quality
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: P-030042
FACILITY ID NO.: 001-00193
AQCR: 64 **CLASS:** B
SIC: 3949, 2899 **ZONE:** 11
UTM COORDINATE (km): 552.2 , 4826.2

1. PERMITTEE
Michael's of Oregon Co.

2. PROJECT
Permit to Construct Modification

3. MAILING ADDRESS 2100 S. Silverstone Way	CITY Meridian	STATE ID	ZIP 83642
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4. FACILITY CONTACT Brian Schroeder	TITLE General Manager of Manufacturing	TELEPHONE 208-362-0793
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5. RESPONSIBLE OFFICIAL Brian Schroeder	TITLE General Manager of Manufacturing	TELEPHONE 208-362-0793
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6. EXACT PLANT LOCATION 2100 S. Silverstone Way, Meridian, Idaho	COUNTY Ada
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7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Firearm accessories manufacturing

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and 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.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the 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.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

C. STEPHEN ALLRED, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: February 23, 2004

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CO	carbon monoxide
DEQ	Department of Environmental Quality
gal/mo	gallons per month
gal/yr	gallons per any consecutive 12-month period
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer(s)
NO _x	nitrogen oxides
O&M	operations and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
TAP's	toxic air pollutants
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030042

Permittee	Michael's of Oregon Co.	Facility ID No. 001-00193	Date Issued:	February 23, 2004
Location:	Meridian, Idaho			

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

This PTC supercedes the following permit:

- PTC No. 001-00193, issued December 16, 2002

Regulated Sources

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

Table 1.1 REGULATED EMISSIONS SOURCES

Permit Sections	Source Description	Emissions Controls
2	Accessories manufacturing	Baghouse and set of two flat fabric filters
3	Liquid storage tanks	None

Permittee	Michael's of Oregon Co.	Facility ID No. 001-00193	Date Issued:	February 23, 2004
Location:	Meridian, Idaho			

2. ACCESSORIES MANUFACTURING

2.1 Process Description

Shooting accessories such as gun cases, chemical storage bottles, holsters, etc. are produced in the accessories manufacturing process.

2.2 Emissions Control Description

Process air passes through a baghouse and a set of two flat fabric filters (filter system).

Operating Requirements

2.3 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M manual for the filter system, which describes the procedures that will be followed to comply with General Provision 2 and manufacturer specifications for the baghouse and flat fabric filters. This manual shall remain onsite at all times and shall be made available to DEQ representatives upon request.

2.4 Filter Operation

The filter system shall be operated to control particulate matter emissions from the accessories manufacturing process.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030003

Permittee	Michael's of Oregon Co.	Facility ID No. 001-00193	Date Issued:	February 23, 2004
Location:	Meridian, Idaho			

3. STORAGE TANKS**3.1 Process Description**

This facility has seven onsite storage tanks. Three 5,000 gallon vertical storage tanks hold white mineral oil, ethanol, and kerosene. Two 500 gallon day storage tanks hold Hoppes No. 9 and one 500 gallon day storage tank holds white mineral oil. One 400 gallon mixing tank is used in making Hoppes No. 9. Red mineral oil and the proprietary compound are used directly from drums.

None of the tanks used in the production of Hoppes No. 9 have a capacity greater than or equal to 40 m³; therefore, the performance standards contained in 40 CFR 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*, do not apply.

Operating Requirements**3.2 Annual Throughput Limit**

The maximum production of Hoppes No. 9 shall not exceed 60,000 gallons per any consecutive 12-month period.

Monitoring and Recordkeeping Requirements**3.3 Throughput Monitoring**

The permittee shall monitor and record the amount of Hoppes No. 9 produced on a monthly and annual basis to demonstrate compliance with Permit Condition 3.2. The annual amount of Hoppes No. 9 produced shall be determined by summing the daily Hoppes No. 9 produced monthly, expressed as gallons per month (gal/mo), and then summing the monthly Hoppes No. 9 produced over the previous consecutive 12-month period, expressed as gallons per year (gal/yr).

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030042

Permittee	Michael's of Oregon Co.	Facility ID No. 001-00193	Date Issued:	February 23, 2004
Location:	Meridian, Idaho			

4. EMISSIONS INVENTORY

The following table is a summary of the emissions increases and decreases associated with this permit modification. The emissions inventory table is provided for informational purposes only.

Table 4.1 EMISSIONS INVENTORY

Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Decrease (T/yr)	Change in Annual Emissions (T/yr)
NO _x	0	0	0
SO ₂	0	0	0
CO	0	0	0
PM/PM ₁₀	0	0	0
VOC	5.9e-3	0	5.9e-3
TAPS/ HAPS	5.7e-3	0	5.7e-3
Total:	1.2e-2	0	1.2e-2

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-0300

Permittee	Michael's of Oregon Co.	Facility ID No. 001-00193	Date Issued:	February 23, 2004
Location:	Meridian, Idaho			

5. PERMIT TO CONSTRUCT GENERAL PROVISIONS

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 and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq., and the permittee is subject to penalties for each day of noncompliance.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If compliance testing is specified, the permittee must schedule and perform such testing within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup. This requirement shall be construed as an ongoing requirement. The permittee shall not operate the source without testing within 180 days. If testing is not conducted within 180 days after initial startup, then each day of operation thereafter without the required compliance test constitutes a violation. Such testing must strictly adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from DEQ. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to DEQ upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030047

Permittee	Michael's of Oregon Co.	Facility ID No. 001-00193	Date Issued:	February 23, 2004
Location:	Meridian, Idaho			

7. 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.

8. In accordance with IDAPA 58.01.01.123, 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.