Teton Sales Company
P.O. Box 177
Caldwell, Idaho 83606

DE/AFS/SF

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Department of Environmental Quality
State Air Program

November 1, 2007

Shawnee Chen
Senior Air Quality Engineer
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, Idaho 83706

RE: Response to Draft Tier I Operating Permit- Facility ID No. 027-00067

Dear Ms. Chen:

Teton Sales Company (Teton Sales) is submitting a response to information requested by the Idaho Department of Environmental Quality (DEQ) on October 25, 2007. Below is the information requested and Teton Sales' responses.

1. Table 3.3 monitoring requirements for the door-coating spray booth particulate matter filtration system.

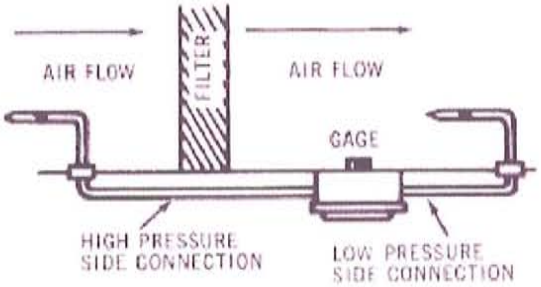
   To address § 64.3 (b) (1) Data Representativeness: Detector location and installation specifications to provide for obtaining representative data, please answer the following questions:

   1) Why the data Teton Sales obtained are representative?
   2) Are the pressures measured from the current locations representing the pressures of the filter system?

   Response:
   1) The data obtained from the Dwyer Mark II Manometer is representative of the actual pressure drop across the filter utilized in the filtration system. The manometer has been installed in accordance with manufacturer instructions and is designed for air filter gage applications.

   2) The pressure measured by the Dwyer Mark II Manometer represents the pressure drop across the filter. The manometer has been installed per manufacturer's recommendations as described below. Included in Attachment A is a copy of the Dwyer Mark II Manometer installation instructions which includes a diagram of the system.

   The Dwyer Mark II Manometer is mounted within 3ft. of filter bank as shown in the diagram below. Tubing adaptors have been installed on each side of the filter. Tubing is run from the clean side of filter to the positive pressure side of gage (left fitting). Tubing is run from the downstream side to the low pressure side of gage (right fitting).



2. Periodic Compliance Certification Condition (21)(a) Dates for submittal of annual compliance certification.

   Response: Teton Sales is requesting that the annual compliance certification be based on a calendar year schedule. The annual compliance certification shall cover the compliance period from January 1st to December 31st of each year[MA1].

3. Semiannual Monitoring Reports Condition (24)- Dates for submittal of semiannual monitoring reports.

   Response: Teton Sales is requesting that the semiannual monitoring reports be based on a calendar year schedule. The semiannual reporting periods shall be from January 1st to[MA2] June 30th and July 1st to December 31st. The semiannual reports will be submitted to DEQ within 30 days of the end of the specified reporting period.

Should you have any questions regarding the information submitted, please contact myself or Melissa Armer of JBR Environmental Consultants, Inc. at 208.853.0883.

I certify that based on information and belief formed after reasonable inquiry, the statements and information enclosed are true, accurate and complete to the best of my knowledge.

Respectfully Submitted,

Diane Puri

Diane Puri
Teton Sales Company

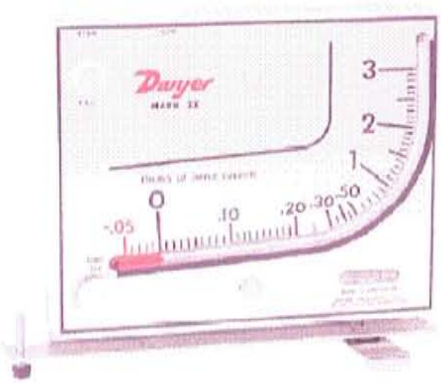
cc: Melissa Armer, JBR

Enclosures: Dwyer Mark II Manometer Information

Attachment A
Dwyer Mark II Manometer

Mark II Series Molded Plastic Manometers

Specifications - Instructions and Operation



Mark II Model No. 25
inclined-vertical manometer,
(shown with optional A-612 portable stand)

Dwyer Mark II Manometers come in a variety of ranges. Make sure the oil being used is for the correct manometer.

Mark II #25, 27, MM-80 and M-700 Pa use red gage oil (specific gravity 0.826).

Mark II #26, 28 and MM180 use blue gage oil (specific gravity 1.9).

If additional oil is required, call or fax nearest Dwyer office listed at bottom of page.

INSTALLATION

Position manometer on a vertical surface. Drill two 1/8" or 9/64" holes on a vertical line 315/16" apart. Loosely mount manometer with self-tapping screws provided. Adjust gage until level bubble is centered in level vial, then secure the manometer tightly.

For portable use, order optional A-612 Portable Stand.

FILLING

Turn the zero set knob counterclockwise until it stops, then turn clockwise 3 full turns. This puts zero in approximately the middle of the travel adjustment in either direction. Remove the fill plug and fill with gage fluid until fluid reaches zero on scale. Minor adjustments can be made to adjust zero by adjusting zero knob. Replace fill plug. If gage is overfilled, remove excess by inserting pipe cleaner through the fill port to blot up excess oil.

MAINTENANCE

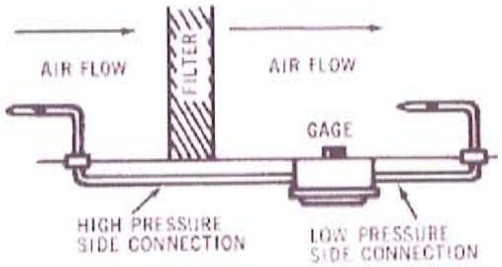
Check oil level regularly and adjust zero with zero adjust knob. Be sure tubing connections are disconnected and gage is open to atmosphere before adjusting zero.

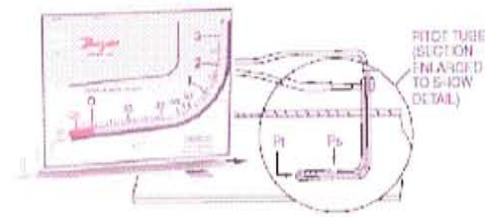
Clean with mild soap and water. Avoid any cleaning fluids which may result in damaging the gage.

ACCESSORIES

Each Mark II manometer includes two tubing connectors for 1/8" pipe or sheet metal ducts, two mounting screws, 3/4 oz. bottle of indicating fluid, red and green pointer flags, 8' of double column tubing and instructions.

DWYER INSTRUMENTS, INC.
P.O. BOX 373 • MICHIGAN CITY, INDIANA 46361, U.S.A.
Phone: 219/879-8000
Fax: 219/872-9057
www.dwyer-inst.com
e-mail: info@dwyer-inst.com





PITOT TUBE SENSES TOTAL AND STATIC PRESSURES. MANOMETER MEASURES VELOCITY PRESSURE (DIFFERENCE BETWEEN TOTAL AND STATIC PRESSURES).

AIR FILTER GAGE

Mount gage within 3 ft. of filter bank. Install tubing adapters on each side of filter. Run tubing from clean side of filter to positive pressure side of gage (left fitting). Run downstream side to low pressure side of gage (right fitting). Install green and red arrows adjacent to indicating tube to indicate filter condition.

AIR VELOCITY METER

A pitot tube should be used for air velocity readings. Install the pitot tube and gage carefully to ensure accuracy. Select a location for the pitot tube with al least four diameters of smooth straight sections of duct both upstream and downstream. Install pitot tube in the center of duct with tip directed into air stream. Connect the right angle (leg parallel to tip) to negative (right fitting) and straight pitot tube connection to positive (left connection) of gage. The velocity reading shown on the gage is the center or maximum velocity. For average velocity across the full area, multiply by a factor of 0.9.

No's. 27 and 28 require pitot tube at additional cost. See Bulletin F-41-F.

The velocity indicated is for dry air at 70°F, 29.9" barometric pressure and a resulting density of 0.075 lb/ft³. For variation from these standard conditions, corrections may be based upon the following data.

AIR VELOCITY CALCULATIONS:

$$\text{Air Velocity} = 1096.2 \sqrt{\frac{Pv}{D}}$$

where Pv = velocity pressure in inches of water
D = Air density in lb/ft³

$$\text{Air Density} = 1.325 \times \frac{P_B}{T}$$

where P_B = Barometric Pressure in inches of mercury
T = Absolute Temperature (indicated temperature °F plus 460)

Flow in cu. ft. per min. = Duct area in square feet x air velocity in ft. per min.