



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor
Toni Hardesty, Director

June 2, 2005

Certified Mail No. 7000 1670 0013 8129 0034

Mr. Dave Yoder
Safety and Environmental Affairs Manager
Jayco, Inc.
621 Washington Street South
Twin Falls, ID 83301

RE: Facility ID No. 083-00092, Jayco, Inc., Twin Falls
Final Permit Letter

Dear Mr. Yoder:

The Idaho Department of Environmental Quality (DEQ) is issuing revised Permit to Construct (PTC) Number P-050401 to Jayco, Inc. in accordance with IDAPA 58.01.01.200 through 228 (*Rules for the Control of Air Pollution in Idaho*)(*Rules*). This permit is effective immediately and replaces PTC No. P-040424 issued January 14, 2005.

This permit does not release Jayco, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. Please be aware that compliance with Section 210 (*Rules*) is required for all modifications that include, but are limited to, new adhesives, caulks, solvents, degreasers, and paints that may be used by Jayco, Inc. in the future.

A representative of the Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations 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 contested case, I encourage you to call Bill Rogers, Regional Permit Program Coordinator, at (208) 373-0502, or wrogers@deq.state.gov, to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/BR/sd
Enclosures

P-050410
Permit No. P-050401

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....	3
1. PERMIT TO CONSTRUCT SCOPE	4
2. RV ASSEMBLY LINE – EU-L1 AND EU-L2.....	5
3. WOODWORKING OPERATIONS – EU-W-1	7
4. PERMIT TO CONSTRUCT GENERAL PROVISIONS.....	8

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
Jayco	Jayco, Inc.
km	kilometer
MSDS	Material Safety Data Sheet(s)
NO _x	nitrogen oxides
O&M	operations and maintenance
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
RV	recreational vehicle
SIC	Standard Industrial Classification
SM80	synthetic minor facility with a potential to emit greater than or equal to 80% of the major source threshold level(s)
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050401 P-050410

Permittee:	Jayco, Inc.	Facility ID No. 083-00092	Date Issued:	June 2, 2005
Location:	Twin Falls, Idaho			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This PTC is a revision to the facility's initial PTC No. P-040424, issued January, 14, 2005. The revision clarifies that the manufacturing process consists of two assembly lines (EU-L1 and EU-L2) and that the Woodworking Operations are controlled by a dust collector and not a cyclone baghouse. Emissions do not increase as a result of this permit to construct revision.

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	RV assembly line – EU-L1	Uncontrolled
2	RV assembly line – EU-L2	Uncontrolled
3	Woodworking operations – EU-W-1	Dust Collector

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050401 P-050410

Permittee:	Jayco, Inc.	Facility ID No. 083-00092	Date Issued:	June 2, 2005
Location:	Twin Falls, Idaho			

2. RV ASSEMBLY LINE – EU-L1 AND EU-L2

2.1 Process Description

The RV assembly lines, identified as process EU-L1 and EU-L2, includes the following activities: adhesive application by spraying or rollcoating to secure parts, degreasing/solvent wiping to clean aluminum and fiberglass before applying decals, caulking to seal joints, and touch-up and repair painting for scratches and maintenance (plastic, fiberglass, and metal substrates). The physical design capacity of EU-L1 and EU-L2 is four RV's per hour.

2.2 Emissions Control Description

Air quality emissions from EU-L1 and EU-L2 include PM₁₀, VOCs, and HAPs, all of which are exhausted to the interior of the manufacturing building. Emissions escaping to the atmosphere from the manufacturing building are fugitive emissions and are uncontrolled.

Emissions Limits

2.3 HAP Emissions Limits

- HAP emissions from EU-L1 and EU-L2 shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.
- HAP emissions from EU-L1 and EU-L2 shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.

2.4 VOC Emissions Limit

VOC emissions from EU-L1 and EU-L2 shall not exceed 95 tons per any consecutive 12-month period (T/yr).

Operating Requirements

2.5 Material Purchase Records

For process EU-L1 and EU-L2, the permittee shall maintain the purchase records of all manufacturing-related materials that contain HAPs, TAPs, and VOCs including but not limited to, adhesives, caulks, degreasers, solvents, and paints. The purchase records shall remain on site for the most recent two year period and shall be made available to DEQ representatives upon request.

2.6 Material Safety Data Sheets

For process EU-L1 and EU-L2, the permittee shall maintain the MSDS' for the manufacturing-related materials that contain HAPs, TAPs, and VOCs purchased pursuant to Permit Condition 2.5. The MSDS' shall remain on site at all times and shall be made available to DEQ representatives upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050401 P-050410

Permittee:	Jayco, Inc.	Facility ID No. 083-00092	Date Issued:	June 2, 2005
Location:	Twin Falls, Idaho			

Monitoring and Recordkeeping Requirements

2.7 Material Usage Records

For process EU-L1 and EU-L2, the permittee shall monitor and record monthly, the usage of each manufacturing-related material that contains HAPs, TAPs, and VOCs. The usage records shall remain on site for the most recent two year period and shall be made available to DEQ representatives upon request.

2.8 HAP Monitoring Requirements

The permittee shall monitor and record the monthly and annual HAP emissions from EU-L1 and EU-L2 using the purchase records required by Permit Condition 2.5, the MSDS' required by Permit Condition 2.6, and the material usage records required by Permit Condition 2.7 to demonstrate compliance with Permit Condition 2.3. Annual HAP emissions shall be determined by summing monthly HAP emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent two year period and shall be made available to DEQ representatives upon request.

2.9 VOC Monitoring Requirements

The permittee shall monitor and record the monthly and annual VOC emissions from EU-L1 and EU-L2 using the purchase records required by Permit Condition 2.5, the MSDS' required by Permit Condition 2.6, and the material usage records required by Permit Condition 2.7 to demonstrate compliance with Permit Condition 2.4. Annual VOC emissions shall be determined by summing monthly VOC emissions over the previous consecutive 12-month period. Records of this information shall be maintained on site for the most recent two year period and shall be made available to DEQ representatives upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050401 P-050410

Permittee:	Jayco, Inc.	Facility ID No. 083-00092	Date Issued:	June 2, 2005
Location:	Twin Falls, Idaho			

3. WOODWORKING OPERATIONS – EU-W-1

3.1 Process Description

Woodworking operations consist of various saws, routers, milling equipment, and one dust collector (DC-1) which consists of a material handling fan, a hopper, and filter bags. Waste wood material from the various woodworking operations is pneumatically conveyed to the material handling fan. As dust enters the hopper section, heavier dust particles fall down into the inside collecting drum. The remaining dust travels into the inside of the filter bags, which controls PM₁₀ emissions. The dust collector vent exhausts to the interior of the manufacturing building. The physical design capacity of EU-W-1 is 5,000 pounds of wood material per hour.

3.2 Emissions Control Description

Air quality emissions from EU-W-1 are PM₁₀. The PM₁₀ emissions are controlled by a dust collector that vents to the interior of the manufacturing building. Emissions escaping to the atmosphere from the manufacturing building are fugitive emissions and are uncontrolled.

Operating Requirements

3.3 Fugitive Dust

The permittee shall reasonably control the emissions of fugitive dust from the facility pursuant to General Provision 8.

3.4 Dust Collector Operations

The dust collector shall be operated whenever EU-W-1 operates.

3.5 Dust Collector Maintenance

The permittee shall maintain and operate the dust collector according to manufacturer and O&M manual specifications.

3.6 Operations and Maintenance Manual

Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the dust collector to demonstrate compliance with General Provision 2. The O&M manual shall specify, at a minimum, the recommended type and number of bags, and the recommended maintenance required to maintain the dust collector. The O&M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050401 P-050410

Permittee: Jayco, Inc.	Facility ID No. 083-00092	Date Issued: June 2, 2005
Location: Twin Falls, Idaho		

4. 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.
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 5 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 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.

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.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050401 P-050410

Permittee:	Jayco, Inc.	Facility ID No. 083-00092	Date Issued:	June 2, 2005
Location:	Twin Falls, Idaho			

Within 30 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 written 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.

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. All reasonable precautions shall be taken to prevent particulate matter from becoming airborne. In determining what is reasonable, consideration will be given to factors such as the proximity of dust emitting operations to human habitations and/or activities and atmospheric conditions which might affect the movement of particulate matter. Some of the reasonable precautions may include, but are not limited to, the following:
 - **Use Of Water Or Chemicals.** Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land.
 - **Application Of Dust Suppressants.** Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
 - **Use Of Control Equipment.** Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - **Covering Of Trucks.** Covering, when practical, open bodied trucks transporting materials likely to give rise to airborne dusts.
 - **Paving.** Paving of roadways and their maintenance in a clean condition, where practical.
 - **Removal Of Materials.** Prompt removal of earth or other stored material from streets, where practical.
9. Combustion sources at this facility shall be fired on natural gas exclusively.
10. The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
11. 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.