



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

September 10, 2007

Certified Mail No. 7000 0520 0016 4835 0951

Dale Swikert, President
Mirage Enterprises, Inc.
2212 Industrial Road
Nampa, Idaho 83687

RE: Facility ID No.087-00014, Mirage Enterprises, Inc., TNT Trailers/Weiser
Final Permit Letter

Dear Mr. Swikert:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0091 to Mirage Enterprises, Inc. to relocate the two paint spray booths formerly used at your Nampa facility to your facility in Weiser, where they will be combined and operated as a single paint booth, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on May 22, 2007. This permit is effective immediately. This permit does not release Mirage Enterprises, Inc., from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 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, Idaho 83709-2239, Fax: (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, Air Quality Compliance Officer, at (208) 373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends 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 contested case, I encourage you to contact Cheryl Robinson at (208) 373-0502 or cheryl.robinson@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

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Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\CR\ssaa

Project No. P-2007.0091

Enclosures

Mirage Enterprises, Inc., TNT Trailers/Weiser Facility
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HARD COPY TO FACILITY

en: Tom Krinke, Boise Regional Office
Cheryl Robinson, Permit Writer
Marilyn Seymore/ Pat Rayne, AQ Division
Stationary Source Administrative Assistant

en-web: Laurie Kral, U.S. EPA Region 10

cc: Dale Swikert, dale@mirageinc.com
Jason Starry, jason@mirageinc.com
Trent White, trent@mirageinc.com

Eric Albright, Geomatrix Consultants, Inc., ealbright@geomatrix.com

c: Reading File (Ltr Only)
Source File
Permit Binder
Bill Rogers, Permit Coordinator (Ltr Only)
Phyllis Heitman, AQ Division (Ltr Only)

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Acronyms, Units, and Chemical Nomenclature

| | |
|------------------|--|
| AQCR | Air Quality Control Region |
| DEQ | Department of Environmental Quality |
| °F | degrees Fahrenheit |
| ft/sec | feet per second |
| HAPs | hazardous air pollutants |
| IDAPA | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| gal/hr | gallons per hour |
| K | degrees Kelvin |
| km | kilometer |
| lb/hr | pound per hour |
| m | meter(s) |
| m/sec | meters per second |
| MSDS | material safety data sheet |
| 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 |
| T/yr | tons per year |
| UTM | Universal Transverse Mercator |
| VOC | volatile organic compound |

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0091

| | | |
|-------------------|--|----------------------------------|
| Permittee: | Mirage Enterprises, Inc., operated as TNT Trailers | Facility ID No. 087-00014 |
| Location: | Weiser, Idaho | |

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 The purpose of this permit is to construct a single paint booth facility comprised of two paint booths formerly used at the Mirage-Nampa facility (Facility ID 027-00092). The new booth will be used to paint cargo trailers.
- 1.2 This is the initial permit to construct (PTC) for this facility.

Regulated Sources

- 1.3 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 | <p><u>Paint Booth</u> Max Daily Operating Hours: 10 Max Material Usage: Cargo Trailer Paint (Gavlon): 40 gal/day 4.0 gal/hr</p> | <p><u>Airless Spray Gun</u> Mfr: Graco Model: Contractor II Type: Airless Transfer Efficiency: Minimum 75% Rated Capacity: 14.4 gal/hr</p> <p><u>Paint Booth Design:</u></p> <ul style="list-style-type: none"> • The paint booth consists of a horizontal drive-through structure equipped with doors at each end. • Exhaust system blowers maintain a negative pressure in the booth to ensure that paint emissions are contained within the booth. • The blowers pull air from the interior of the booth through a series of particulate filters to a 36-inch diameter stack and a 30-inch diameter stack <p><u>Stacks #1 and #2, Filter Systems</u> Mfr: Paint Pockets Co. Model: PP Series PM Control: Minimum 94% Dimensions: Stack #1: 30 - 20" x 20" x 15" pocket filters Stack #2, 16 - 20" x 20" x 15" pocket filters</p> |

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2. PAINT BOOTH

2.1 Process Description

An airless spray gun with minimum 75% transfer efficiency is used in the paint booth. The paint booth consists of a horizontal drive-through structure equipped with doors at each end. Exhaust system blowers pull air from the interior of the paint booth through a series of particulate filters to one of two exhaust stacks. The booth is used to coat cargo trailers with paint.

2.2 Emissions Control Description

Table 2.1 PAINT BOOTH DESCRIPTION

| Emissions Unit(s) / Process(es) | Emissions Control Device | Emissions Point |
|--|---|--|
| Paint Booth | <p><u>Airless Spray Gun</u> Mfr: Graco Model: Contractor II Type: Airless Transfer Efficiency: Minimum 75% Rated Capacity: 14.4 gal/hr</p> <p><u>Paint Booth Design:</u></p> <ul style="list-style-type: none"> • The paint booth consists of a horizontal drive-through structure equipped with doors at each end. • Exhaust system blowers maintain a negative pressure in the booth to ensure that paint emissions are contained within the booth. • The blowers pull air from the interior of the booth through a series of particulate filters to a 36-inch diameter stack and a 30-inch diameter stack (horizontal releases) <p><u>Stacks #1 and #2, Filter Systems</u> Mfr: Paint Pockets Co. Model: PP Series PM Control: Minimum 94% Dimensions: Stack #1: 30 - 20" x 20" x 15" pocket filters Stack #2, 16 - 20" x 20" x 15" pocket filters</p> | <p><u>Stacks #1 and #2</u> Stack Height: 27 feet (8.23 m) Exit: Vertical with rain cap Exit Diameter: Stack 1: 36 inches (0.9144 m), Stack 2: 30 inches (0.762 m) Exit Flow Rate: 23,000 acfm Modeled as 0.001 m/sec (capped) Exit Temperature: 68°F (293 K)</p> |

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Emissions Limits

2.3 Emissions Limits

The PM₁₀ and VOC emissions from the paint booth filter system stacks shall not exceed any corresponding emission rate limit listed in Table 2.2.

Table 2.2 SPRAY PAINT BOOTH EMISSIONS LIMITS¹

| Source Description | PM ₁₀ | | Total VOCs | |
|--|---------------------|------|------------|-------------------|
| | lb/day ² | T/yr | lb/hr | T/yr ² |
| Paint booth filter system stacks, combined | 4.5 | | | 20.5 |

¹ In the absence of any other creditable evidence, compliance is assured by complying with this permit's operating, monitoring, and recordkeeping requirements.

² Pounds per calendar day.

³ Tons per consecutive 12-calendar month period.

2.4 Opacity Limit

Emissions from the paint booth stacks, or any other stack, vent, or functionally equivalent opening associated with the paint booth, shall 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 shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.5 Materials Usage Limits

- The total solids content of paint, primer, and paint-related materials used in the paint booth shall not exceed 300 pounds of solids per calendar day.
- The total VOC content of paint, primer, and paint-related materials used in the paint booth shall not exceed 112 pounds of VOCs per calendar day.

2.6 Paint Booth Spray Gun and Exhaust Filter Systems

- The permittee shall install, maintain, and operate, according to manufacturer's specifications and recommendations, spray gun system(s) with a minimum 75% transfer efficiency.
- The permittee shall install, maintain, and operate, according to manufacturer's specifications and recommendations, a spray booth filter system(s) with a minimum 94% capture efficiency for PM₁₀ and stack height and exit velocities as described in Table 2.1.
- The permittee shall not conduct priming or painting in the spray booth unless the paint booth exhaust filter systems are installed and operating.

2.7 Pressure Drop Monitoring Device

The permittee shall install, calibrate, maintain, and operate, according to manufacturer's specifications and recommendations, a pressure drop monitoring device to measure the pressure drop across the paint booth filter systems.

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2.8 Operations and Maintenance (O&M) Manual

Within 60 days after issuance of this permit, the permittee shall have developed an O&M manual for the paint booth filter system. The manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the filter systems. The manual shall contain at a minimum, the following: the recommended pressure drop operating range of the filter systems, the routine maintenance and repair procedures for the filter systems, and the routine replacement schedule for the filters and spray gun tips. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request. Once developed, a copy of the manual shall be submitted to DEQ's Boise Regional Office at the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706

2.9 Paint Booth Exhaust System Filter Pressure Drop

The pressure drop across the paint booth exhaust system filters shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

2.10 Material Usage Monitoring

Records shall be maintained in accordance with General Provision 7. The permittee shall maintain records that contain, at a minimum, the following information:

- The manufacturer name and product number for each paint, primer, and paint-related material applied in the spray booth, including paint, primer, accelerant, catalysts, and reducers.
- The density in pounds per gallon, solids content (in percent or pounds per gallon), and VOC content (in percent or pounds per gallon) for each paint, primer, and paint-related material applied in the spray booth.
- A daily log showing the total amount in gallons of each paint, primer, and paint-related material sprayed in the paint booth each calendar day (for any day that painting is done in the booth).
- A daily log showing the calculated total solids content of paint, primer, and paint-related material sprayed in the paint booth each calendar day (for any day that painting is done in the booth) in pounds, to demonstrate compliance with Permit Conditions 2.3 and 2.5.
- A daily log showing the total VOC content of paint, primer, and paint-related material sprayed in the paint booth each calendar day (for any day that painting is done in the booth) in pounds, to demonstrate compliance with Permit Condition 2.5.
- A monthly log showing the total VOC content of paint, primer, and paint-related material sprayed in the paint booth each calendar month (for any month that painting is done in the booth) in pounds and

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tons per calendar month, and the sum in tons per year for the most recent consecutive 12-calendar month period, to demonstrate compliance with Permit Condition 2.3.

2.11 Filter System Pressure Drop Monitoring

The permittee shall monitor and record the differential pressure across the paint booth filter system once per day when operating (for any day that painting is done in the booth) to demonstrate compliance with Permit Conditions 2.7 and 2.9. Records of this information shall be maintained in accordance with General Provision 7.

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

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.

[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.

[IDAPA 58.01.01.211, 5/1/94]

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, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. 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

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;

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- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. 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;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. 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, 5/1/94]

Performance Testing

- 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.

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.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information 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 and 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, 5/1/94]

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Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. 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, 5/1/94]

False Statements

10. 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, 3/23/98]

Tampering

11. 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, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. 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.