



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 25, 2008

Certified Mail No. 7190 0596 0014 0000 3854

Ted Rowley
Safety Manager
Interstate Group LLC
224 Carnation Drive
Nampa, Idaho 83667

RE: Facility ID No. 027-00084, Interstate Group LLC, Nampa
Final Permit to Construct and Tier II Operating Permit

Dear Mr. Rowley:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit and Permit to Construct No. T2-2008.0096 to Interstate Group LLC for its Nampa facility, in accordance with the Rules for the Control of Air Pollution in Idaho, 58.01.01.400 – 410 and IDAPA 58.01.01.200 - 428, respectively. This permitting action is a permit renewal.

This permit is based on your permit application received on May 30, 2008. This permit is effective immediately and replaces Tier II Operating Permit and Permit to Construct No. T2-030032, issued on August 27, 2003, the terms and conditions of which no longer apply". This permit does not release Interstate Group LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

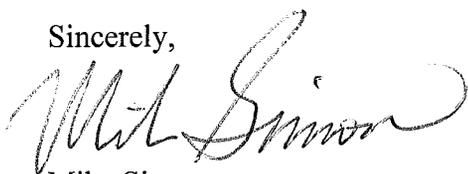
In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Thomas Krinke, Air Quality Compliance Officer, at 208-373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ 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.

The enclosed permit is effective immediately and is based on the information contained in your permit application and on the relevant comments received during the public comment period. Modification to and/or renewal of this permit shall be requested in a timely manner in accordance with the Rules for the Control of Air Pollution in Idaho.

Interstate Group LLC, Nampa
September 25, 2008
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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 Robert Baldwin at 208-373-0502 or robert.baldwin@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is fluid and cursive, with a large initial "M" and "S".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/REB/hp Permit No. T2-2008.0096



**Air Quality
PERMIT TO CONSTRUCT
and
TIER II OPERATING PERMIT**

State of Idaho
Department of Environmental Quality

PERMIT No.: T2-2008.0096
FACILITY ID No.: 027-00084
AQCR: 64 **CLASS:** SM-80 **ZONE:** 11
SIC: 3715 **NAICS:** 336999
UTM COORDINATE (km): 537.4, 4826.1

1. PERMITTEE
Interstate Group LLC

2. PROJECT
Tier II operating permit and permit to construct renewal

3. MAILING ADDRESS 224 Carnation Drive	CITY Nampa	STATE ID	ZIP 83687
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4. FACILITY CONTACT Shawn Luteyn	TITLE Chief Operations Officer	TELEPHONE (208) 466-6777
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5. RESPONSIBLE OFFICIAL Shawn Luteyn	TITLE Chief Operations Officer	TELEPHONE (208) 466-6777
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6. EXACT PLANT LOCATION 224 Carnation Drive	COUNTY Canyon
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7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Cargo Trailer assembly and finishing

8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228 and IDAPA 58.01.01.400 through 470, respectively. This permit 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.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

The permit to construct conditions in 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 in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.


ROBERT BALDWIN, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY


MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:	September 25, 2008
DATE EXPIRES:	September 25, 2013

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List of Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
CO	carbon monoxide
Department	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
HVLP	high volume, low pressure
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
lb/mo	pound per month
MMBtu	million British thermal units
Mn	Manganese
Ni	Nichel
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
PTE	potential to emit
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
T/mo	tons per month
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT AND TIER II OPERATING PERMIT NO.: T2-2008.0096

Permittee:	Interstate Group LLC
Location:	Nampa, Idaho

Facility ID No. 027-00084

1. PERMIT SCOPE

Purpose

- 1.1 The purpose of the permit is the renewal of the Tier II operating permit and Permit to Construct issued on March 14, 2003.
- 1.2 This PTC and Tier II operating permit renewal replaces the following permits, the terms and conditions of which shall no longer apply:
 - Tier II Operating Permit and Permit to Construct No. T2-010717, issued March 14, 2003
 - T2-030032, a revision of the permitting action of T2-010717, issued August 27, 2003

Regulated Sources

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

TABLE 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control
3	Xylene trailer cleaning	None
3	Painting operations in side paint booth, HVLP spry gun	Paint booth, including arrestor filter pads for particulate matter control
3	Undercoat painting outside building, Airless spray equipment	
3	Other sealants, adhesives, coatings	

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2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. 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 that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- 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 lands.
 - 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.
 - 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, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a weekly 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 shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall 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.

[09/18/2008]

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Permittee:	Interstate Group LLC
Location:	Nampa, Idaho

Facility ID No. 027-00084

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 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.

- 2.8 The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Open Burning

- 2.9 The permittee shall comply with the requirements of IDAPA 58.01.01.600-623, Rules for Control of Open Burning.

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Reports and Certifications

2.10 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, 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. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, ID 83706
Phone: (208) 373-0550
Fax: (208) 373-0287

Obligation to Comply

2.11 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

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Permittee:	Interstate Group LLC
Location:	Nampa, Idaho

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3. PAINT, COATINGS, ADHESIVES, SOLVENTS, AND CLEANERS

3.1 Process Description

Trailers are welded, cleaned with xylene, painted in a paint booth, finished with plywood floor and interior surfaces and trim, and an undercoat is applied.

3.2 Emission Control Description

Emissions from trailer cleaning are uncontrolled. Emissions from painting are controlled by the use of an enclosed paint booth. Emissions from undercoating are controlled by a partial enclosure.

TABLE 3.1 PAINT, COATINGS, ADHESIVES, SOLVENTS, AND CLEANERS USE

Emissions Unit / Process	Emissions Control Device
Xylene trailer cleaning	None
Painting operations	Paint booth with filters
Undercoat painting	Partial enclosure
Other sealants, adhesives, coatings	None

Emission Limits

3.3 Emission Limits

- Total VOC emissions from the sources listed in Table 3.1 shall not exceed 2.97 T/mo or 35.6 tons per any consecutive 12-month period.
- Total HAP emissions from the sources listed in Table 3.1 shall not exceed 1.5 T/mo or 18.0 tons per any consecutive 12-month period.
- Total emissions of any single HAP from the sources listed in Table 3.1 shall not exceed 0.83 T/mo or 9.88 tons per any consecutive 12-month period.
- The PM and PM10 emissions from the paint booth shall not exceed 11 lb/day or 1.1 tons per any consecutive 12-month period.

Operating Requirements

3.4 The VOC emissions shall be calculated using the following equation:

$$VOC = \sum_{i=1}^n (X_i \times Y_i)$$

Where:

- VOC = Emissions of VOC per month and/or per year (lb/mo, T/yr)
- n = Number of compounds used
- X_i = Usage of compound i per month and/or year (lb/mo, T/yr)
- Y_i = Weight percent of VOC contained in compound i

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3.5 The HAP emissions shall be calculated using the following equation:

$$HAP = \sum_{i=1}^n (X_i \times Y_i)$$

Where:

HAP	=	Emissions of HAP per month and/or per year (lb/mo, T/yr)
n	=	Number of compounds used
X _i	=	Usage of compound i per month and/or year (lb/mo, T/yr)
Y _i	=	Weight percent of HAP contained in compound i

3.6 The PM and PM₁₀ emissions shall be calculated using the following equation:

$$PM = \left(\sum_{i=1}^n [i \times p] \right) \times 0.55 \times 0.15$$

Where:

PM	=	Emissions of particulate matter PM or PM ₁₀ per day and/or per year (lb/mo, T/yr)
I	=	Usage of compound i per day and/or per year (lb/day, T/yr)
n	=	Number of compounds used
p	=	percent solids by weight in compound I (% solids)
0.55	=	45% transfer efficiency
0.15	=	85% filter efficiency

Note: *Compound* refers to any paint, adhesive, solvent, or any other solid containing chemicals.

3.7 The permittee shall maintain a filter system to control particulate generated in the paint booth. The filter systems shall have a minimum average point removal efficiency of 85%.

3.8 The permittee shall have installed a manometer on the paint booth to measure the pressure drop across the filter system.

3.9 The pressure drop across the filter system shall be maintained with the manufacturer and O&M manual specifications.

3.10 The permittee shall have developed an O&M manual for the air pollution control equipment used to control PM emissions from the paint booth. The O&M manual shall specify the maintenance requirements for the filter pads. The O&M manual shall be maintained on site at all times and shall be made available to Department representatives upon request.

3.11 The undercoat painting operation shall be preformed inside a building enclosed on at least three sides.

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Permittee: Interstate Group LLC

Location: Nampa, Idaho

Facility ID No. 027-00084

Monitoring and Recordkeeping Requirements

3.12 The permittee shall monitor and record the following information to demonstrate compliance with the emissions rate limits and operating requirements of this permit:

- Trade name and identification number, or similar, of each compound used
- Material Safety Data Sheet(s) (MSDS) for each compound used
- Number of each compound used
- The density, expressed as pounds-per-gallon or other volumetric measurement, of each compound used
- The VOC content, expressed as percent by weight (wt%), of each compound used
- The HAP content(s), expressed as percent by weight (wt%), of each compound used
- The solids content, expressed as percent by weight (wt%), of each compound used
- The amount, expressed as gallons-per-day -month -year, of each compound used
- The calculated VOC, HAP, and PM and PM₁₀ emissions using the equations provided in Permit Conditions 3.4, 3.5, and 3.6 for the frequencies listed (day, month, year)
- The pressure drop across the paint booth filter system once per day while the paint booth is being operated. Pressure drop monitoring and recording requirements are not required on days the paint booth is not operating.

All monitoring and recordkeeping shall be maintained in accordance with General Provision 7.

[09/25/2008]

AIR QUALITY PERMIT TO CONSTRUCT AND TIER II OPERATING PERMIT NO.: T2-2008.0096

Permittee: Interstate Group LLC
Location: Nampa, Idaho

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4. SUMMARY OF EMISSION RATE LIMITS

**TABLE 4.1 SUMMARY OF ALL EMISSION RATE LIMITS IN THE
TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT**

Interstate Group, Nampa Emission Limits ^a – Hourly (lb/hr), and Annual ^b (T/yr)										
Source Description	Hourly PM ₁₀ ^c Emissions (lb/hr)	Annual PM ₁₀ ^c Emissions (T/yr)	VOC		Total HAP		VOC		Any One HAP	
			lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Paints, coatings, adhesives and cleaners (facility-wide)	--	--	2.97	35.6	1.5	18	2.97	35.6	0.83	9.88
Paints and coatings in paint booth (particulate emissions)	11	1.1	--	--	--	--	--	--	--	--

^a As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.

^b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c Includes condensibles

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5. PERMIT TO CONSTRUCT AND TIER II OPERATING PERMIT 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, 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.

[IDAPA 58.01.01.211, 405, 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, 406, 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 emission 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;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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- 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, 405, 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]

Expiration and Renewal

12. This permit shall be renewable on the expiration date, provided the permittee submits an application for renewal to the Department and continues to meet all terms and conditions contained in the permit. The expiration of this permit will not affect the operation of the stationary source or facility during the administrative procedure period associated with the permit renewal process.
[IDAPA 58.01.01.209.04, 7/1/02]

Transferability

13. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06 and 404.05.
[IDAPA 58.01.01.209.06, 404.05, 4/11/06]

Severability

14. 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.
[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]