



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

December 6, 2017

Jerry Whitehead, President
Western Trailer Co. – S. Federal Way
P.O. Box 5598
Boise, ID 83705-0598

RE: Facility ID No. 001-00349 Western Trailer Company, Boise
Final Permit Letter, DEQ Initiated Permit Reissuance

Dear Mr. Whitehead:

The Department of Environmental Quality (DEQ) is reissuing Permit to Construct (PTC) No. P-2017.0043, Project 61928, to Western Trailer Co. – S. Federal Way to list the modified Filter Inspection and O&M Manual requirements under permit condition 2.12, to accurately reflect the capability of the internal monitoring system within the filtration system, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is effective immediately and replaces PTC No. 2017.0043, issued on October 25, 2017. This permit does not release Western Trailer Co. – S. Federal Way from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. The accompanying Statement of Basis document remains unchanged.

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 that 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 Christina Boulay at (208) 373-0502 or christina.boulay@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".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/cb

Enclosure
Permit No. P-2017.0043 Project 61928

Air Quality

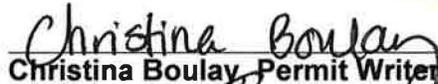
PERMIT TO CONSTRUCT

Permittee Western Trailer Co. – S. Federal Way
Permit Number P-2017.0043
Project ID 61928
Facility ID 001-00349
Facility Location 8623 S. Federal Way
Boise, ID 83716

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) 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; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) 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; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho 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. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued October 25, 2017


Christina Boulay, Permit Writer


Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is the initial permit to construct (PTC) for an existing Trailer Manufacturing Company.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	<u>Plasma Cutting 1</u> Manufacturer: Kinetic with Hypertherm Torch Model: Kinetic 2500 and Hypertherm HPR260XD Date of Construction: September 2014	<u>Cartridge Filter System (F1)</u> Manufacturer: Torit Model: Kinetic DFE3-12 Two Stage Filtrations System: MERV 11 Pre-filters and HEPA Filters Control Efficiency: 99.97% or greater for , PM _{2.5} and PM ₁₀
	<u>Plasma Cutting 2</u> Manufacturer: Komatsu Model: Razor Rev II Date of Construction: September 2015	<u>Cartridge Filter System (F2)</u> Manufacturer: Torit Model: Kinetic DFO3-12 Two Stage Filtrations System: MERV 11 Pre-filters and HEPA Filters Control Efficiency: 99.97% or greater for PM _{2.5} and PM ₁₀
2	<u>Unit Heater-Five Identical Heaters (UH1-UH5)</u> Manufacturer: Modine Model: PDP300AE0130 Maximum Capacity (each unit):: 300,000 BTU/hr Allowable Fuel Type: Natural Gas Date of Construction: September 2014	None
	<u>Unit Heaters-Thirteen Identical Heaters(IR1-IR13)</u> Manufacturer: Re-Verber-Ray Model: DR160 Maximum Capacity (each unit):: 160,000 BTU/hr Allowable Fuel Type: Natural Gas Date of Construction: September 2014	None
	<u>Office Heater</u> Manufacturer: Bryant Model: 915SA42060S17A Maximum production rate: 60,000 Btu/hr Allowable Fuel Type: Natural Gas Date of Construction: September 2014	None
2	<u>Metal Cutting</u> Manufacturer: CMS Model: NC-Pentax4.5/T-PX5+GF Date of Construction: September 2014	None
	<u>Metal Cutting</u> Manufacturer: Elumatec Model: SBZ 151 Date of Construction: September 2015	<u>Particulate Control Filter</u> Manufacturer: Elumatec Control Efficiency: 99.00% or greater for PM _{2.5} and PM ₁₀

2 Trailer Manufacturing

2.1 Process Description

Western Trailer Company is located at 8623 S. Federal Way, Boise Idaho 83716. They manufacture and assemble truck trailers. There is no welding or painting at this facility. The large warehouse houses five Modine heaters, and thirteen Re-Verber-Ray infrared heaters, all are indirect-fired natural gas heaters. The office houses one Bryant indirect-fired natural gas furnace.

Three different kinds of metals are used to manufacture trailers, mild steel substrate, stainless steel substrate, and aluminum. The type of metal determines which machine will be used to cut the material. Mild Steel Substrate and Stainless Steel substrate are cut on the two plasma machines, and aluminum is cut on the metal cutting machines.

Plasma Cutting Machine 1 is a Kinetic machine with a hypertherm torch. Plasma Cutting Machine 2 is a Komatsu machine. The Kinetic plasma machine was installed in 2014, and the Komatsu plasma machine was installed in 2015. Both have control units to decrease emissions produced from the cutting process, which were also installed in 2014 and 2015, and replaced in 2017.

There are two metal cutting machines which only cut aluminum. One metal cutting machine is manufactured by CMS, installed in September 2014, and the other is manufactured by Elumatec, installed in September of 2015.

The trailers are assembled on site, however if a part needs to be painted or welded it is sent off site for that process to be completed.

2.2 Control Device Descriptions

Two control devices are used to decrease emissions created during the plasma cutting process, and one control device is used to decrease emissions created during the metal cutting process. A two stage cartridge filter system is used for the plasma machines, and a particulate control filter system is used for the metal cutting machine. The control units for the plasma machines are a primary stage Torit Ultra-Web Cartridge Filter System with a control efficiency of 99.0% and a second stage Micro Guard with a control efficiency of 99.97% or greater. The CMS metal cutting machine does not have an emissions control unit. The Elumatec metal cutting machine has a 99.00% or greater efficiency particulate control filter to capture suspended particles. Please refer to Table 2.1 for a detailed description of the control units.

Table 2.1 Plasma Cutting, Metal Cutting, and Unit Heaters

Emissions Units / Processes	Control Devices
<u>Plasma Cutting 1</u> Manufacturer: Kinetic with Hypertherm Torch Model: Kinetic 2500 and Hypertherm HPR260XD Date of Construction: September 2014	<u>Cartridge Filter System (F1)</u> Manufacturer: Torit Model: Kinetic DFE3-12 Two Stage Filtrations System: MERV 11 Pre-filters and HEPA Filters Control Efficiency: 99.97% or greater for PM ₁₀ and PM _{2.5}
<u>Plasma Cutting 2</u> Manufacturer: Komatsu Model: Razor Rev II Date of Construction: September 2015	<u>Cartridge Filter System (F2)</u> Manufacturer: Torit Model: Kinetic DFO3-12 Two Stage Filtrations System: MERV 11 Pre-filters and HEPA Filters Control Efficiency: 99.97% or greater for PM ₁₀ and PM _{2.5}
<u>Unit Heater-Five Identical Heaters (UH1-UH5)</u> Manufacturer: Modine Model: PDP300AE0130 Maximum Capacity (each unit): 300,000 BTU/hr Allowable Fuel Type: Natural Gas Date of Construction: September 2014	None
<u>Unit Heaters-Thirteen Identical Heaters(IR1-IR13)</u> Manufacturer: Re-Verber-Ray Model: DR160 Maximum Capacity (each unit):: 160,000 BTU/hr Allowable Fuel Type: Natural Gas Date of Construction: September 2014	None
<u>Office Heater</u> Manufacturer: Bryant Model: 915SA42060S17A Maximum production rate: 60,000 Btu/hr Allowable Fuel Type: Natural Gas Date of Construction: September 2014	None
<u>Metal Cutting</u> Manufacturer: CMS Model: NC-Pentax4.5/T-PX5+GF Date of Construction: September 2014	None
<u>Metal Cutting</u> Manufacturer: Elumatec Model: SBZ 151 Date of Construction: September 2015	<u>Particulate Control Filter</u> Manufacturer: Elumatec Model: Control Efficiency: 99.00% or greater for PM ₁₀ and PM _{2.5}

Emission Limits

2.3 Emission Limits

The emissions from Plasma Cutter 1, Plasma Cutter 2, Unit Heaters (UH1-UH5), Unit Heaters (IR1-IR13), and the Office Heater (OH1) stacks shall not exceed any corresponding emission rate limit listed in Table 2.2.

Table 2.2 Plasma Cutter 1 and 2, Metal Cutter 1 and 2, Unit Heaters, and Office Furnace Emission Limits ^(a)

Source Description	PM ₁₀ ^(b)		SO ₂		NO _x		CO		VOC	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Plasma Cutting 1	4.9E-05	9.5E-04	N/A	N/A	1.3	2.6	N/A	N/A	N/A	N/A
Plasma Cutting 2	4.9E-05	2.4E-04	N/A	N/A	1.3	0.5	N/A	N/A	N/A	N/A
Metal Cutting 1	0.05	0.20	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Metal Cutting 2	7.1E-04	3.12E-03	N/A	NA	N/A	N/A	N/A	N/A	N/A	N/A
Unit Heaters (UH1-UH5)	0.01	0.03	8.8E-04	2.1E-03	0.15	0.35	0.12	0.29	8.1E-03	0.01
Unit Heaters (IR1-IR13)	0.02	0.04	1.2E-03	2.9E-03	0.20	0.48	0.17	0.40	0.01	0.02
Office Heater (OH1)	4.0E-04	2.0E-03	3.5E-05	1.5E-04	0.01	0.03	5.0E-03	0.02	3.2E-04	1.4E-03

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.

2.4 Opacity Limit

Emissions from each plasma cutter, or any other stack, vent, or functionally equivalent opening associated with any plasma cutter, 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 Fuel Type for All Heaters and Office Furnace

All heaters and office furnace shall burn natural gas only.

2.6 Natural Gas Usage Limit for All Heaters and Office Furnace

A total annual natural gas usage for all unit heaters and the office furnace shall not exceed 17 MMscf/year.

2.7 Material Type for Plasma Cutting

Plasma Cutters 1 and 2 shall only cut mild steel substrate and stainless steel.

2.8 Throughput Limits for Plasma Cutting

- The amount of kerf material removed from mild steel by plasma cutters 1 and 2 shall not exceed 150,000 pounds per year (lb/yr).
- The amount of kerf material removed from mild stainless steel by plasma cutters 1 and 2 shall not exceed 5,640 pounds per year (lb/yr).

2.9 Filter System Requirement for Plasma Cutting

The permittee shall install and operate a cartridge filter system to control PM_{2.5} and PM₁₀ emissions from Plasma Cutter 1 and Plasma Cutter 2 units. The control efficiency of the filter system shall be 99.97% or greater to control PM_{2.5} and PM₁₀ emissions.

2.10 Material Type for Metal Cutters 1 and 2

Metal Cutters 1 and 2 shall only cut aluminum.

2.11 Filter System Requirement for Metal Cutting

The permittee shall operate the already installed particulate control filter system to control PM_{2.5} and PM₁₀ emissions from the Metal Cutter 2 unit. The control efficiency of the filter system shall be 99.00% or greater to control PM_{2.5} and PM₁₀ emissions.

2.12 Filter System Inspection and O&M Manual

The filters for the filtration system for the plasma cutters shall be checked and replaced as outlined in the O&M Manual's specifications. Documentation of the filter replacement shall remain on site at all times and shall be made available to DEQ representatives upon request.

The permittee shall have developed an Operation and Maintenance (O&M) Manual for the plasma cutter dust collectors. The O&M Manual shall describe the procedures that will be followed to ensure that all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit are at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintained in good working order and operated as efficiently as practicable to meet the manufacturer's air pollution control device specifications. This manual shall remain on-site at all times and shall be made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

2.13 Natural Gas Usage Monitoring

Each calendar month, the permittee shall monitor and record the amount of natural gas in MMscf/month and sum the previous consecutive 12-months natural gas usage in MMscf/yr to demonstrate compliance with Natural Gas Usage Limit for All Heaters and Office Furnace permit condition.

2.14 Type of Material Cut Monitoring

The permittee shall monitor and record the type of material cut in Plasma Cutter 1, Plasma Cutter 2, Metal Cutter 1, and Metal Cutter 2 for the previous month in type of material cut to demonstrate compliance with Material Type for Plasma Cutting permit condition and Material Type for Metal Cutting permit condition.

2.15 Plasma Cutting Throughput Monitoring

Each calendar month, the permittee shall monitor and record the pounds of kerf material removed in Plasma Cutter 1 and Plasma Cutter 2 for the previous month in pounds of kerf material removed per month and for the previous 12 calendar months in pounds of kerf material removed per year to demonstrate compliance with Throughput Limits for the Plasma Cutting permit condition.

2.16 Filter System Requirement for Plasma Cutting

The permittee shall maintain documentation showing that the control efficiency of the plasma cutting filter system has 99.97% or greater to control PM_{2.5} and PM₁₀ emissions.

2.17 Filter System Requirement for Metal Cutting

The permittee shall maintain documentation showing that the control efficiency of the metal cutting filter system has 99.00% or greater to control PM_{2.5} and PM₁₀ emissions.

3 General Provisions

General Compliance

3.1 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.)

[Idaho Code §39-101, et seq.]

3.2 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]

3.3 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

3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 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

3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- 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; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7 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.
- 3.8 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.
- 3.9 Within 60 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 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 and 4/11/15]

Monitoring and Recordkeeping

- 3.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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, 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]

Excess Emissions

- 3.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 3.12 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

- 3.13 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

- 3.14 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

- 3.15 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

- 3.16 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 58.01.01.211, 5/1/94]