



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

December 26, 2018

Aaron Price, Production Manager
Trinity Trailer Mfg., Inc. - Eisenman
7533 S. Federal Way
Boise, ID 84716

RE: Facility ID No. 001-00341, Trinity Trailer Mfg., Inc. - Eisenman, Boise
Final Permit Letter

Dear Mr. Hearst:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2018.0005 project 61993 to Trinity Trailer Mfg., Inc. - Eisenman located at Boise for the existing trailer manufacturing plant. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received January 19, 2018 and on all relevant comments received on DEQ's proposed permit during the public comment period.

This permit is effective immediately. This permit does not release Trinity Trailer Mfg., Inc. - Eisenman 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 Tom Krinke, AQ Compliance Officer, at 208-373-0419 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 Shawnee Chen at (208) 373-0502 or shawnee.chen@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\syc

Permit No. P-2018.0005 PROJ 61993

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Trinity Trailer Mfg., Inc. - Eisenman
Permit Number P-2018.0005
Project ID 61993
Facility ID 001-00341
Facility Location 8200 S. Eisenman Road
Boise ID, 83716

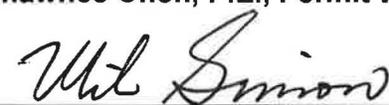
Permit Authority

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 December 26, 2018



Shawnee Chen, P.E., 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 truck trailer manufacturing facility.

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	<p><u>Natural Gas-Fired Heaters</u></p> <p>Three (3) Fab Shop Tube Heaters (H1) Manufacturer: Robert Gordon Model: Vantage Cth1-150 Heat input rate: 0.15 MMBtu/hr, each Allowable fuel type: natural gas Manufactured: 1992</p> <p>Three (3) Fab Shop Tube Heaters (H2) Manufacturer: Robert Gordon Model: Vantage Cth1-125 Heat input rate: 0.125 MMBtu/hr, each Allowable fuel type: natural gas Manufactured: 1992</p> <p>Fab Shop Changing Room (H3) Manufacturer: Payne Model: M1MB090ABW Heat input rate: 0.09 MMBtu/hr Allowable fuel type: natural gas Manufactured: 2016</p> <p>Four (4) Fab Shop Tube Heaters (H4) Manufacturer: Robert Gordon Model: Vantage Cth1-150 Heat input rate: 0.15 MMBtu/hr, each Allowable fuel type: natural gas Manufactured: 1995</p> <p>10 Fab Shop Radiant Heaters (H5) Manufacturer: Sunstar Model: SG6-L5C Heat input rate: 0.06 MMBtu/hr, each Allowable fuel type: natural gas Manufactured: 2015</p> <p>15 Fab Shop Radiant Heaters (H6) Manufacturer: Robert Gordon Model: EG-60 Heat input rate: 0.054 MMBtu/hr, each Allowable fuel type: natural gas Manufactured: 2007</p>	None

Permit Section	Source	Control Equipment
2	<p>Fab Shop Break Room (H7) Manufacturer: Payne Model: PG92SBS48080B Heat input rate: 0.08 MMBtu/hr Allowable fuel type: natural gas Manufactured: 2016</p> <p>Chain And Axel Tube Heater (H8) Manufacturer: Robert Gordon Model: VANTAGE CTH1-150 Heat input rate: 0.15 MMBtu/hr Allowable fuel type: natural gas Manufactured: 1995</p> <p>Paint Shop Paint Booth (H9) Manufacturer: Viking Model: DEM-2000LX68 Heat input rate: 2.8 MMBtu/hr Allowable fuel type: natural gas Manufactured: 1990</p> <p>Paint Shop Paint Booth (H10) Manufacturer: Dayton Model: 4LX68 Heat input rate: 0.4 MMBtu/hr Allowable fuel type: natural gas Manufactured: 2013</p> <p>Paint Shop Wash Bay Power Washer (H11) Manufacturer: Hydrotek Model: HN30008E4R Heat input rate: 0.7 MMBtu/hr Allowable fuel type: natural gas Manufactured: 2010</p> <p>Paint Shop Main Heater (H12) Manufacturer: Dayton Model: 4LX68 Heat input rate: 0.4 MMBtu/hr Allowable fuel type: natural gas Manufactured: 2013</p> <p>Six (6) Paint Shop Radiant Heater (H13) Manufacturer: Dayton Model: 5VD65A Heat input rate: 0.09 MMBtu/hr, each Allowable fuel type: natural gas Manufactured: 2014</p> <p>Supervisor Office Heater (H14) Manufacturer: Payne Model: E4EB-015H Heat input rate: 0.08 MMBtu/hr, each Allowable fuel type: natural gas Manufactured: 2016</p>	None

Permit Section	Source	Control Equipment
2	<p>Front Office Heater (H15) Manufacturer: Trane Model: TUX100R948VO Heat input rate: 0.1 MMBtu/hr, each Allowable fuel type: natural gas Manufactured: 1998</p> <p>Front Office Heater (H16) Manufacturer: Carrier Model: TG9S100C16MP11A Heat input rate: 0.1 MMBtu/hr, each Allowable fuel type: natural gas Manufactured: 2001</p> <p>Two (2) Compressor Room Heater (H17) Manufacturer: Dayton Model: 5VD63A Heat input rate: 0.06 MMBtu/hr, each Allowable fuel type: natural gas Manufactured: 2013</p> <p>Maintenance Room Heater (H18) Manufacturer: Payne Model: PG8JAA036070AFJA Heat input rate: 0.07 MMBtu/hr, each Allowable fuel type: natural gas Manufactured: 2013</p>	None
3	<p>Laser Cutting (LSR1) Manufacturer: Trumpf Model: 3030 Date of Construction: 2001</p> <p>Hand-Held Plasma Cutting</p> <p>Five (5) Plasma Cutting (PC1, PC2, PC3, PC4, and PC5) Manufacturer: Hypertherm Model: Powermax 65 With Nozzle Ht220819 Manufactured: 2001</p> <p>Four (4) Plasma Cutting (PC6, PC7, PC7, and PC9) Manufacturer: Hypertherm Model: Powermax 1000 Manufactured: 2001</p> <p>Two (2) Plasma Cutting (PC10 and PC11) Manufacturer: Hypertherm Model: Powermax 900 Manufactured: 2001</p> <p>One (1) Plasma Cutting (PC12) Manufacturer: Hypertherm Model: Powermax 800 Manufactured: 2001</p>	<p>Filter LSRF1 (integral vacuum system) Manufacturer and Model Number: Richardson Electronics RFT064/10 Emissions capture efficiency: 100% Filter control efficiency: 99.75% Vented inside the building</p> <p>Kemper: K1- K33 Manufacturer and Model Number: Kemper Filter Master XL Date of installation: 07/2017 Fume capture efficiency: 100% Filter control efficiency: 99.98% Vented inside the building</p>

Permit Section	Source	Control Equipment
3	<p>Welding (W1-W18) (51 welding machines) Manufacturers: Miller Model: XMT-350 (23), Syncrowave 250dx (1), Millermatic 180 (2), Alt 304 (6), CP-302 (7), XMT-300 (2), CP-200 (8), and XMT-450 (2) Types: Mig/Tig, GMAW Date of Construction: 2001</p> <p>Welding wire type: Hobart Quantum Arc ER80S-D2 and Lincoln Blue MAX 308lsi</p>	<p>Kemper: K1- K33 Manufacturer and Model Number: Kemper Emissions capture efficiency: 100% Filter control efficiency: 99.98% Vented inside the building</p>
4	<p>Abrasive Blaster (AB1) Manufacturer: Marco Model: BLASTMASTER 160 Blast machine maximum capacity: 160 ft³ Manufactured: 2001</p> <p>Operation limits: 4 hr/day, 1040 hr/yr, limit facility-wide emissions below the EL.</p>	<p>Blast Filter (ABF1) Manufacturer and Model Number: Donaldson Torit Endura-Tek Filter efficiency: 80% for PM/PM₁₀ and 50% for PM_{2.5}</p>
5	<p>Paint Booth Type: dry filters, side draft Manufactured: 2001</p> <p>Heater - refer to Paint Shop Paint Booth (H9) for details</p> <p>Two coating spray guns Manufacturer: Graco or equivalent Model: G40 or equivalent Type: air assisted Transfer efficiency by manufacture: 75%</p>	<p>Filters Manufacturer: Paint Pockets Model: Green Filter efficiency: 99.43%</p>
	<p>Solvent Recycling Manufacturer: Uni-Ram Corporation Model: 1600 Recycler maximum capacity: 16 gallon Manufactured: 1998</p>	<p>None, vented into the room</p>

2 Combustion Sources

2.1 Process Description

There are 54 natural gas fired heaters with the total rated heat input rate of 8.46 MMBtu/hr. They are heaters by indirect heat transfer except for the heater (H9) for the paint shop paint booth. Refer to Table 1.1 for the details.

2.2 Control Device Descriptions

All heaters are uncontrolled.

Emission Limits

2.3 Opacity Limit

Emissions from each heater stack, or any other stack, vent, or functionally equivalent opening associated with each heater, 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.

2.4 Fuel-Burning Equipment

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas.

2.5 Emission Limits

The emissions from the combustion sources shall not exceed the limits listed in Appendix A of the permit.

Operating Requirements

2.6 Fuel Usage

- All heaters shall combust natural gas exclusively.
- Natural gas used by the facility shall not exceed 29.1 million standard cubic feet per any consecutive 12- month period (MMscf/yr).

Monitoring and Recordkeeping Requirements

2.7 Fuel Usage Monitoring

Each calendar month, the permittee shall monitor and record the amount of natural gas used by the facility for the previous month (scf/month) and for the previous consecutive 12-month period (scf/yr) to demonstrate compliance with the Fuel Usage permit condition.

3 Cutting and Welding (Fabrication)

3.1 Process Description

Plasma cutting of steel, stainless steel, and aluminum occur in the general warehouse area. The facility uses 12 Hypertherm plasma cutters. Emissions are controlled with a Kemper fume extraction filter unit at each of the plasma cutting operations. Thirty three Kemper fume extraction filter units are available at the facility and used when plasma cutting or welding is performed. The controlled emissions are vented inside the building.

Laser cutting of stainless steel is performed by a Trumpf 3030 laser cutter. The laser cutter includes a beam generator that uses carbon dioxide gas to create a highly focused beam of energy. When cutting stainless steel, the laser beam melts the material and a nonreactive gas pushes the material from the kerf. The equipment includes an integral vacuum system that exhausts emissions through the on-board filter distributed by Richardson Electronics rated at 99.75% control efficiency.

Welding is performed in the general warehouse area using 51 welding machines. Twenty three are XMT-350, in addition to one Syncrowave 250dx, two Millermatic 180, six Alt 304, seven CP-302, two XMT-300, eight CP-200, and two XMT-450. Thirty three Kemper fume extraction filter units are available at the facility and are used when welding or plasma cutting is performed. The controlled emissions are vented inside the building. Welding is primarily Gas Metal Arc Welding (GMAW) and MigTig with carbon steel wire and stainless steel wire. Two types of welding wire are used, Hobart Quantum Arc ER80S-D2 and Lincoln Blue MAX 308lsi.

3.2 Control Device Descriptions

Table 3.1 Assembly Operations Description

Emissions Units / Processes	Control Devices	Emission Points
Plasma cutting	Portable Kemper fume extraction filter unit at each of the plasma cutting operation and welding operation	Vented inside the building
Welding		
Laser cutting	A filter unit	

Emission Limits

3.3 Emission Limits

The emissions from welding, plasma cutting, and laser cutting shall not exceed the annual limits for NO_x, PM₁₀ and PM_{2.5} as listed in Appendix A of the permit.

3.4 Opacity Limit

Emissions from each of the building vents, or any other stack, vent, or functionally equivalent opening associated with the fabrication operation, 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

3.5 Plasma Cutting Aggregated Hours Limit

For each material type, the aggregate number of operational hours by all of the individual plasma cutters shall not exceed the hours listed in the following table:

Table 3.2 Aggregate Number of Operational Hours by All of Individual Cutters

Material	aggregate number of operational hours (hr/yr) ¹
Stainless Steel	1,248
Steel	208
Aluminum	416

¹ Per any consecutive 12-month period

3.6 Laser Cutting Throughput Limit

For each material type, the amount of material removed by laser cutting shall not exceed the annual limit listed in the following table:

Table 3.3 Amount of Material Removed by Laser Cutting

Type	Usage (lb/yr) ¹
Stainless Steel	3,393
Steel	17,000
Aluminum	17,000

¹ Per any consecutive 12-month period

3.7 Welding Operation

3.7.1 The permittee shall use welding electrode rods and welding processes as specified in Table 3.4 unless using an alternate welding electrode rod as specified in Section 6 of the permit.

Table 3.4 Welding Process and Welding Rod Type

Welding Process	Welding Rod Type
GMAW, MIG, TIG	Quantum Arc ER80S-D2 Hobart
GMAW	Lincoln BLUE MAX, mig 308LSi

3.7.2 Use an alternate welding electrode rod

Prior to using an alternate welding electrode rod, the permittee shall in addition comply with Section 6 of the permit.

3.8 Dust Collector Operation

- For each plasma cutting operation and each welding operation

The permittee shall operate a fume extraction filter unit to control emissions from each plasma cutting operation and each welding operation. The overall control efficiency shall be no less than 99.98% for PM₁₀ and PM_{2.5}. The filter shall have minimum control efficiency of 99.98% for PM₁₀ and PM_{2.5}. The permittee shall operate the fume extraction filter units in accordance with the Operation and Maintenance (O&M) manual.

- For each laser cutting operation

The permittee shall operate a filter unit to control particulate emissions from laser cutting operation. The overall control efficiency shall be no less than 99.75% for PM₁₀ and PM_{2.5}. The filter shall have minimum control efficiency of 99.75% for PM₁₀ and PM_{2.5}. The permittee shall operate the filter unit in accordance with the O&M manual.

Monitoring and Recordkeeping Requirements

3.9 Plasma Cutting Aggregated Hours Monitoring

For each material type, each calendar month, the permittee shall monitor and record the aggregate number of operational hours by all of the individual cutters for the previous month (hr/month) and for the previous consecutive 12-month period (hr/yr) to demonstrate compliance with Plasma Cutting Aggregated Hours Limit permit condition.

3.10 Laser Cutting Throughput Monitoring

Each calendar month, the permittee shall monitor and record the amount of stainless steel, steel, and aluminum removed by laser cutting respectively for the previous month (lb/month) and for the previous consecutive 12-month period (lb/year) to demonstrate compliance with Laser Cutting Throughput Limit permit condition.

3.11 Welding Operation Monitoring

- The permittee shall keep the safety data sheet (SDS) of welding electrode rods used at the facility on-site.
- For an alternate welding electrode rod, the permittee shall
 - keep on-site the SDS of the electrode welding rod,
 - keep on-site the description of the respective welding process (e.g., GMAW, MIG, TIG, GMAW)

3.12 Dust Collector Filter Control Efficiency Records

The permit shall keep records of the filters used in the dust collectors to demonstrate compliance with the filter control efficiencies specified in Dust Collector Operation permit condition. The records shall remain on-site at all times and shall be made available to DEQ representatives upon request.

3.13 Filter Inspection

Filters for each filtration unit shall be checked and replaced as outlined in the O&M Manual. Documentation of the filter replacement shall remain on-site at all times and shall be made available to DEQ representatives upon request.

3.14 O&M Manual

Within 60 days of the permit issuance, the permittee shall have developed an O&M Manual for the dust collectors according to manufacturer's specifications and recommendations. 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.

4 Abrasive Blasting

4.1 Process Description

Abrasive blasting is performed to prepare carbon steel components surfaces for coating in an enclosed custom-made blast booth. Environmental Abrasives' Fusion Red abrasive media is sprayed using two spray nozzles connected to a skid-mounted blast machine, Model BLASTMASTER 160, 160 ft³ capacity with Trinity tested spray rate of 1,350 lb/hr at 125 psi.

4.2 Control Device Descriptions

Emissions are routed to Donaldson Torrit Endura-Tek cartridge filters. Thirty six cartridges are installed in the filter unit. The cartridges are rated MERV 10 (ASHRAE 52.2 1999) by the manufacturer.

Table 4.1 Abrasive Blasting Buildings Description

Emissions Units / Processes	Control Devices	Emission Points
Abrasive Blasting	Blast filter unit with 36 cartridges of MARV10 rating (80% for PM/PM ₁₀ and 50% for PM _{2.5})	Abrasive blasting stack (ABF1)

Emission Limits

4.3 Emission Limits

The emissions from the abrasive blasting stack shall not exceed the limits listed in Appendix A of the permit.

4.4 Opacity Limit

Emissions from the abrasive blasting stack, or any other stack, vent, or functionally equivalent opening associated with abrasive blasting stack, 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

4.5 Abrasive Blasting Operation

4.5.1 The permittee shall use Fusion Red Glass as provided in the application unless using an alternate abrasive blasting media as specified in Section 6 of the permit.

- The garnet composition in Fusion Red Glass shall not exceed 50% by weight.
- The daily usage of Fusion Red Glass shall not exceed 9,472 pounds per day.
- The annual usage of Fusion Red Glass shall not exceed 1,231 tons per any consecutive 12-month period.

4.5.2 Using an alternate abrasive blasting media

Prior to using an alternate abrasive blasting media, the permittee shall in addition comply with Section 6 of the permit.

4.6 Blast Filter Unit Operation

The permittee shall operate the blast filter unit to control particulate emissions from the abrasive blasting operation. The cartridges of blast filter unit shall have the minimum control efficiency of

80% for PM/PM₁₀ and 50% for PM_{2.5}. The permittee shall operate the blast filter unit in accordance with the O&M Manual.

Monitoring and Recordkeeping Requirements

4.7 Abrasive Blasting Media Usage Monitoring

- Each day, the permittee shall monitor and record the amount of abrasive blasting media used at the facility to demonstrate compliance with the daily usage limit in Abrasive Blasting Operation permit condition.
- Each calendar month, the permittee shall monitor and record the amount of abrasive blasting media used at the facility for the previous month (ton/month) and for the previous consecutive 12-month period (ton/year) to demonstrate compliance with the annual usage limit in Abrasive Blasting Operation permit condition.

4.8 Abrasive Blasting Media Chemical Component Monitoring

The permittee shall keep safety data sheet (SDS) of each abrasive blasting media used at the facility on-site.

4.9 Blast Filter Unit Control Efficiency Records

The permit shall keep records of the cartridges used in the blast filter unit to demonstrate compliance with the cartridges' minimum control efficiency specified in Blast Filter Unit Operation permit condition. The records shall remain on-site at all times and shall be made available to DEQ representatives upon request.

4.10 Filter Inspection

Cartridges for the blast filter unit shall be checked and replaced as outlined in the O&M Manual. Documentation of the filter replacement shall remain on-site at all times and shall be made available to DEQ representatives upon request.

4.11 O&M Manual

Within 60 days of the permit issuance, the permittee shall have developed an O&M Manual for the blast filter unit according to manufacturer's specifications and recommendations. 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.

5 Coating Operation

5.1 Process Description

Coatings are sprayed on metal in a totally enclosed booth with side draft dry filters and a heater that is regulated in section 2 of the permit. The filters have 99.43% control efficiency. Two Graco G40 air assisted spray guns are used. They are rated at 75-85% transfer efficiency by the spray gun manufacturer.

Used Axalta 105 cleaning solvent is recycled in a 16-gallon Uni-Ram solvent distillation unit located near the paint booth. Emissions from the unit are vented into the room.

5.2 Control Device Descriptions

Table 5.1 Paint Booth Description

Emissions Units / Processes	Control Devices	Emission Points
Paint Booth Two coating spray guns: Manufacturer: Graco or equivalent Model: G40 or equivalent Type: air assisted Transfer efficiency by manufacturer: 75%	Filters Manufacturer: Paint Pockets Model: Green Filter Efficiency: 99.43%	Paint booth stack (PB1)
Solvent Recycling	None, vented into the room	---

Emission Limits

5.3 Emission Limits

The emissions from the coating application and solvent recycling shall not exceed any corresponding annual emissions rate limits listed in Appendix A of the permit.

The daily limits for PM₁₀, PM_{2.5}, VOC, and HAP only apply when an alternative coating material is used as specified in Section 6 of the permit.

5.4 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776.

5.5 Opacity Limit

Emissions from the paint booth stack, or any other stack, vent, or functionally equivalent opening associated with the paint booth stack, 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

5.6 Coating Material Usage Limits

- The maximum amount of primer used at the facility shall not exceed 10,920 gallons per any consecutive 12- month period (gal/yr).
- The maximum amount of topcoat finish paint used at the facility shall not exceed 10,920 gallons per any consecutive 12- month period (gal/yr).

- The maximum amount of Axalta Lacquer Thinner used at the facility shall not exceed 2,600 gallons per any consecutive 12- month period (gal/yr).
- The maximum amount of solvent recycled at the facility shall not exceed 4,160 gallons per any consecutive 12- month period (gal/yr).

5.7 Coating Material Formulations

5.7.1 The permittee shall use coating materials listed in Table 5.2, or their respective equivalent coating materials as defined in Permit Condition 5.7.2 unless using an alternate coating material as specified in Section 6 of the permit.

Table 5.2 Coating Materials

Manufacturer	Coating Material Description						
PPG	Amercoat 65 Thinner or equivalent						
PPG	Amercoat 101 Thinner or equivalent						
PPG	Amercoat 923 Thinner or equivalent						
PPG	Amercoat 370 Cure (Primer) or equivalent						
PPG	Amercoat 370 Pearl Gray Resin (Primer) or equivalent						
PPG	Amercoat 866m Accelerator or equivalent						
PPG	Amershield Cure (Topcoat) or equivalent						
PPG	Composite Topcoat Finish Paint (using the maximum paint density, the maximum contents of solid, VOC, HAP and TAP of the following resins) or equivalent <table border="1" style="margin-left: 40px;"> <tr><td>Amershield Black Resin</td></tr> <tr><td>Amershield Deep Tint Resin</td></tr> <tr><td>Amershield Light Tint Resin</td></tr> <tr><td>Amershield Neutral Tint Resin</td></tr> <tr><td>Amershield Bright Red Resin</td></tr> <tr><td>Amershield Trinity White Resin</td></tr> </table>	Amershield Black Resin	Amershield Deep Tint Resin	Amershield Light Tint Resin	Amershield Neutral Tint Resin	Amershield Bright Red Resin	Amershield Trinity White Resin
Amershield Black Resin							
Amershield Deep Tint Resin							
Amershield Light Tint Resin							
Amershield Neutral Tint Resin							
Amershield Bright Red Resin							
Amershield Trinity White Resin							
Axalta	Axalta Lacquer Thinner or equivalent						

5.7.2 For the purposes of this permit condition, “equivalent” is defined as:

- a solid and VOC content of a new paint material, in lb/gal, as listed on the SDS, is equal to or less than the solid and VOC content, as listed on the SDS, of the corresponding paint material listed in Appendix B of the permit, and
- a wt% of metals, HAP, and TAP multiplying the paint density, in lb/gal, as listed on the SDS, of a new paint material, is equal to or less than the wt% of metals, HAP, and TAP multiplying the paint density, in lb/gal, as listed on the SDS, of the corresponding paint material listed in Appendix B of the permit.

5.7.3 Using an alternate coating material

Prior to using an alternate coating material that does not meet the definition of “equivalent” for this permit condition, the permittee shall in addition comply with Section 6 of the permit.

5.8 Spray Booth and Filters Operation

- The permittee shall install, maintain, and operate a spray booth filter system with a minimum control efficiency of 99.43% for particulate emissions as documented by the filter manufacturer according to the O&M Manual.
- All coating activities at this facility shall be conducted inside a paint spray booth. The filter system shall be operated at all times when the paint spray booth is operating.

5.9 Spray Gun Operation

All painting shall be conducted with air-assisted airless, airless, HVLP, or equivalent technology spray guns with a minimum 75% transfer efficiency as documented by the spray gun manufacturer.

5.10 Solvent Recovery System Operation

The permittee shall install, maintain, and operate the solvent recovery system according to the O&M Manual.

Monitoring and Recordkeeping Requirements

5.11 Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with Odors permit condition. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date 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.

5.12 Coating Material Usage Monitoring

- Each calendar month, the permittee shall monitor and record the amount of primer, topcoat finish paint, and Axalta lacquer thinner used and the amount of solvent recycled for the previous month in gallons per month (gal/month) and for the previous consecutive 12-month period (gal/yr) to demonstrate compliance with Coating Material Usage Limits permit condition.
- When an alternate coating material is used, the permittee shall in addition monitor and record daily coating material usage of each coating material in accordance with Section 6 of the permit.

5.13 Coating Material Formulations Monitoring

For each material used at the facility, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, and thinner/reducer, the permittee shall record and maintain the following records:

- Material purchase volume records
- Safety Data Sheets (SDS)

5.14 Spray Booth Filter Records

The permit shall keep records of the spray booth filter system used at the facility to demonstrate compliance with the filter system minimum control efficiency requirement specified in Spray Booth and Filters Operation permit condition. The records shall remain on-site at all times and shall be made available to DEQ representatives upon request.

5.15 Spray Gun Records

The permit shall keep records of the spray guns used at the facility to demonstrate compliance with the minimum transfer efficiency as documented by the spray gun manufacturer as required in Spray Gun Operation permit condition. The records shall remain on-site at all times and shall be made available to DEQ representatives upon request.

5.16 Filter Inspection

Filters for the spray booth filter system shall be checked and replaced as outlined in the O&M Manual. Documentation of the filter replacement shall remain on-site at all times and shall be made available to DEQ representatives upon request.

5.17 Spray Booth Filter System and Solvent Recovery System O&M Manual

Within 60 days of the permit issuance, the permittee shall have developed an O&M Manual for the spray booth filter system and for the solvent recovery system according to manufacturer's specifications and recommendations. 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.

6 Requirements When Using Alternate Material

- 6.1 When using an alternate welding rod as specified in Permit Condition 3.7.2, an alternate abrasive blasting media as specified in Permit Condition 4.5.2, and/or an alternate coating material as specified in Permit Condition 5.7.3, the permittee shall in addition comply with the requirements in this section.
- 6.2 Prior to using an alternate welding rod, an alternate abrasive blasting media, and/or an alternate coating material, the permittee shall develop a Daily Operation Scenario that meets the following requirements:
- When an alternate coating material is used, propose and record maximum daily coating usage limits for each coating material that will be used in the Scenario, in gallons per day (gal/day).
 - When an alternate welding rod is used, propose and record maximum daily usage limit of each welding rod that will be used in the Scenario, in pound per day (lb/day).
 - When an alternate abrasive blasting material is used, propose and record maximum daily usage limit of each abrasive blasting media that will be used in the Scenario, in lb/day.
 - Calculate emissions for PM₁₀, PM_{2.5}, VOC, and HAP using the calculation methods specified in this section and demonstrate compliance with the emissions limits in Appendix A of the permit.
 - Calculate facility-wide TAP emissions using the calculation methods specified in this section and demonstrate that the facility-wide TAP emissions do not exceed respective emissions screens levels specified in IDAPA 58.01.01.585 and 586.
 - The permittee shall not use or implement any Scenario that does not meet the above requirements.

Daily Operation Scenario Emission Calculation and Compliance for PM₁₀/PM_{2.5}, VOC, and HAP

6.3 Coating Operation

For each Daily Operation Scenario that uses an alternate coating material, emissions from all coating operations, excluding emissions from solvent recycling, shall be estimated and compared against the daily and annual emissions limits for Painting Booth in Appendix A of the permit. The permittee shall not use or implement any Scenario that exceeds an emissions limit for Painting Booth in Appendix A of the permit.

- For compliance with the PM₁₀/PM_{2.5} daily emissions limit for Painting Booth in Appendix A of the permit, PM₁₀/PM_{2.5} emissions shall be estimated by multiplying each coating maximum daily usage limit (gal/day) as proposed in Permit Condition 6.2 by the solids content (lb/gal) of that coating and summing the total emissions from all coatings (lb/day). Emissions may also be multiplied by one minus the transfer efficiency and by one minus the filter control efficiency when control equipment will be applied to such emissions.
- For compliance with the PM₁₀/PM_{2.5} annual emissions limit for Painting Booth in Appendix A of the permit, PM₁₀/PM_{2.5} emissions shall be estimated by multiplying each coating usage of the most recent consecutive 12-month period, including the current month (gal/yr), by the solids content (lb/gal) of that coating, summing the total emissions from all coatings (lb/yr), and then adding this number to the PM₁₀/PM_{2.5} daily emissions rate (lb/day) calculated above. The lb/yr shall be converted to T/yr by multiplying (1 T/2000 lb). Emissions may also be multiplied by one minus the transfer efficiency and by one minus the filter control efficiency when control equipment will be applied to such emissions. The permittee may minus the first

day emissions of this 12-month period to be accurate.

- For compliance with the VOC daily emissions limit for Painting Booth in Appendix A of the permit, VOC emissions shall be estimated by multiplying each coating maximum daily coating usage limit (gal/day) as proposed in Permit Condition 6.2 by the VOC content (lb/gal) for that coating material and summing the total emissions from all coating materials (lb/day).
- For compliance with the VOC annual emissions limit for Painting Booth in Appendix A of the permit, VOC emissions shall be estimated by multiplying each coating usage of the most recent consecutive 12-month period, including current month (gal/yr), by the VOC content (lb/gal) for that coating material, summing the total emissions from all coating materials (lb/yr), and then adding the VOC daily emissions rate (lb/day) calculated above. The lb/yr shall be converted to T/yr by multiplying (1 T/2000 lb). The permittee may minus the first day emissions of this 12-month period to be accurate.
- For compliance with the HAP daily emissions limit for Painting Booth in Appendix A of the permit, HAP emissions shall be estimated by multiplying each coating maximum daily coating usage limit (gal/day) as proposed in Permit Condition 6.2 by the HAP content (lb/gal) for each coating material, and summing the total emissions from all coating materials (lb/day).
- For compliance with the HAP annual emissions limit for Painting Booth in Appendix A of the permit, HAP emissions shall be estimated by multiplying each coating usage of the most recent consecutive 12-month period, including current month (gal/yr), by the HAP content (lb/gal) for each coating material, summing the total emissions from all coating materials (lb/yr), and then adding the HAP daily emissions rate (lb/day) calculated above. The lb/yr shall be converted to T/yr by multiplying (1 T/2000 lb). The permittee may minus the first day emissions of this 12-month period to be accurate.
- For solids content, VOC content, and HAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the solids content, VOC content, or HAP content is listed as below detection on SDS or other documentation, the HAP content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.
- When the solids content, VOC content, or HAP content cannot be determined from SDS or other documentation, the content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.

6.4 Abrasive Blasting

For each Daily Operation Scenario that uses an alternate abrasive blasting media, emissions from all abrasive blasting operations shall be estimated and compared against the daily and annual emissions limits for Abrasive Blasting in Appendix A of the permit. The permittee shall not use or implement any Scenario that exceeds an emissions limit for Abrasive Blasting in Appendix A of the permit.

- For compliance with the PM₁₀ daily emissions limit for Abrasive Blasting in Appendix A of the permit, PM₁₀ emissions shall be estimated by multiplying each abrasive blasting media maximum daily usage limit (lb/day) as proposed in Permit Condition 6.2 by its emissions factor (lb PM₁₀/lb of abrasive blasting media) and by one minus the filter control efficiency of 80% for PM₁₀ by the blast filter unit, and summing the total emissions from all abrasive blasting media (lb/day).

The permittee shall provide supporting documentation for emissions factors that have not been approved by this permitting action.

- For compliance with the PM₁₀ annual emissions limit for Abrasive Blasting in Appendix A of the permit, PM₁₀ emissions shall be estimated by multiplying abrasive blasting media maximum daily usage limit (lb/day) as specified in Permit Condition 4.5.1 for Fusion Red Glass or as specified in Permit Condition 6.2 for an alternate abrasive blasting media by its emissions factor (lb PM₁₀/lb of abrasive blasting media) and by one minus the filter control efficiency of 80% for PM₁₀ by the blast filter unit, summing the total emissions for the past consecutive 364 days (lb/yr), and then adding the PM₁₀ daily emissions rate (lb/day) calculated above. The lb/yr shall be converted to T/yr by multiplying (1 T/2000 lb).
- For compliance with the PM_{2.5} daily emissions limit for Abrasive Blasting in Appendix A of the permit, PM_{2.5} emissions shall be estimated by multiplying the alternate abrasive blasting media maximum daily usage rate (lb/day) as specified in Permit Condition 4.5.1 for Fusion Red Glass or as specified in Permit Condition 6.2 for an alternate abrasive blasting media by its emissions factor (lb PM_{2.5}/lb of abrasive blasting media) and by one minus the filter control efficiency of 50% for PM_{2.5} by the blast filter unit.

The permittee shall provide supporting documentation for emission factors that have not been approved by this permitting action.

- For compliance with the PM_{2.5} annual emissions limit for Abrasive Blasting in Appendix A of the permit, PM_{2.5} emissions shall be estimated by multiplying each day abrasive blasting media maximum daily usage rate (lb/day) by its emissions factor (lb PM_{2.5}/lb of abrasive blasting media) and by one minus the filter control efficiency of 80% for PM_{2.5} by the blast filter unit, summing the total emissions for the past consecutive 364 days (lb/yr), and then adding the PM_{2.5} daily emissions rate (lb/day) calculated above. The lb/yr shall be converted to T/yr by multiplying (1 T/2000 lb).
- For compliance with the HAP emissions limit for Abrasive Blasting in Appendix A of the permit, the permittee shall not use abrasive blasting media that contains HAP.

6.5 Welding

For each Daily Operation Scenario that uses an alternate welding electrode rod, so long as the permittee comply with the control requirements specified in Section 3 of the permit, additional requirements for compliance with PM₁₀/PM_{2.5} and HAP emissions rates are not required.

Daily Operation Scenario Emission Calculation and Compliance for TAP

- 6.6 For each new Daily Operation Scenario that uses an alternate material, for each TAP emitted from an operation using an alternate material, the permittee shall estimate facility-wide emissions rate for that TAP from all operations at the facility as specified in the following and compare the facility-wide TAP rate for that TAP against the TAP Screening Emission Rate in IDAPA 58.01.01.585 and 586. The permittee shall not use or implement any Scenario that TAP emissions exceed any TAP Screening Emission Rates in IDAPA 58.01.01.585 and 586.

6.7 Facility-Wide Emissions Rate Calculation for each TAP from All Sources

For each TAP, facility-wide emissions of that TAP shall be the sum of that TAP from all the following sources.

- For the TAP emitted from combustion, plasma cutting, and laser cutting, the permittee shall use the emissions rate(s) listed in Appendix C of the permit.
- For the TAP emitted from coating:

- If no alternate coating material is used, the permittee shall use the emissions rate listed in Appendix C of the permit.
- If an alternate coating material is used, the permittee shall calculate the TAP emissions in accordance with Permit Condition 6.8.
- For the TAP emitted from abrasive blasting:
 - If no alternate abrasive blasting media is used, the permittee shall use the emissions rate listed in Appendix C of the permit
 - If an alternate abrasive blasting media is used, the permittee shall calculate the TAP emissions in accordance with Permit Condition 6.9.
- For the TAP emitted from welding:
 - If no alternate welding electrode rod is used, the permittee shall use the emissions rate listed in Appendix C of the permit
 - If an alternate welding electrode rod is used, the permittee shall calculate the TAP emissions in accordance with Permit Condition 6.10.

6.8 Coating Operation - TAP

For each Daily Operation Scenario that uses an alternate coating material, for each TAP listed in Table 6.1 and emitted from the coating operation, the permittee shall estimate emissions from all coating materials for that TAP as specified in the following.

- Emissions shall be estimated by multiplying each maximum daily coating usage rate (gal/day) proposed in Permit Condition 6.2 by the TAP content (lb/gal) and summing the total emissions from all coating materials (lb/day) for that TAP. TAP emissions which are designated as a particulate in Table 6.1 may also be multiplied by one minus the documented spray gun transfer efficiency and by one minus the documented filtration system control efficiency when control equipment will be applied to such emissions.
- TAP content (lb/gal) of a coating is specified on the Safety Data Sheet (SDS) for that coating, or shall be calculated by multiplying the weight percentage of TAP (%) by the density (lb/gal) of the coating from the SDS.
- For TAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the TAP content is listed as below detection on SDS or other documentation, the TAP content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.
- When the TAP content cannot be determined from SDS or other documentation, the TAP content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.

Table 6.1 TAP Screening Emission Rates Limits

Regulated TAP	CAS	Particulate?
Acetone	67-64-1	No
Aluminum - Metal and Oxide	7429-90-5	Yes
Aluminum - Soluble Salts	7429-90-5	Yes
n-Amyl Acetate	628-63-7	No
Barium (Soluble Compounds), as Ba	7440-39-3	Yes

Regulated TAP	CAS	Particulate?
2-Butoxyethanol	111-76-2	No
n-Butyl Acetate	123-86-4	No
n-Butyl Alcohol	71-36-3	No
Calcium Carbonate	1317-65-3	Yes
Carbon Black	1333-86-4	Yes
Cyclohexane	110-82-7	No
Cyclohexanone	108-94-1	No
Diacetone Alcohol	123-42-2	No
Dibutyl Phthalate	84-74-2	No
o-Dichlorobenzene	95-50-1	No
Diethyl Phthalate	84-66-2	No
Diisobutyl Ketone	108-83-8	No
Dimethylphthalate	131-11-3	No
Dipropylene Glycol Methyl Ether	34590-94-8	No
2,6-Di- <i>tert</i> -butyl-p-cresol (butylated hydroxytoluene)	128-37-0	No
Ethyl Acetate	141-78-6	No
Ethyl Alcohol	64-17-5	No
Heptane (n-Heptane)	142-82-5	No
Iron Oxide Fume (Fe ₂ O ₃) as Fe	1309-37-1	Yes
Isobutyl Acetate	110-19-0	No
Isobutyl Alcohol	78-83-1	No
Isophorone Diisocyanate	4098-71-9	No
Isopropyl Acetate	108-21-4	No
Isopropyl Alcohol	67-63-0	No
Kaolin	1332-58-7	Yes
Magnesite	546-93-0	Yes
Methacrylic Acid	79-41-4	No
Methyl Acetate	79-20-9	No
Methyl Ethyl Ketone (MEK)	78-93-3	No
Methyl Isoamyl Ketone	110-12-3	No
Methyl Isobutyl Carbinol	108-11-2	No
Methyl n-Amyl Ketone	110-43-0	No
Methyl Propyl Ketone	107-87-9	No
Mica (Respirable Dust)	12001-26-2	Yes
Molybdenum as Mo	7439-98-7	Yes
Nonane	111-84-2	No
Pentane	109-66-0	No
Phosphoric Acid	7664-38-2	No
Propionic Acid	79-09-4	No
n-Propyl Acetate	109-60-4	No

Regulated TAP	CAS	Particulate?
Propyl Alcohol	71-23-8	No
Silica – Amorphous, including: <ul style="list-style-type: none"> • Diatomaceous Earth (uncalcined) • Precipitated Silica • Silica Gel 	61790-53-2 112926-00-8	Yes
Silica - Crystalline - Cristobalite	14464-46-1	Yes
Silica - Crystalline Quartz & Fused Silica	14808-60-7	Yes
Stoddard Solvent	8052-41-3	No
Tetrahydrofuran	109-99-9	No
Trimethyl Benzene (Mixed and Individual Isomers)	25551-13-7	No
VM&P Naphtha	8032-32-4	No
Zinc	7440-66-6	Yes
Zinc Oxide Dust	1314-13-2	Yes

- a) Worst-case pounds of emissions from all coating operations (combined) per day, as calculated using procedures in this permit to estimate these emissions, or as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.

6.9 Abrasive Blasting -TAP

For each Daily Operation Scenario that uses an alternate abrasive blasting media, for each TAP emitted from abrasive blasting operation, the emissions shall be estimated by summing all the following emissions in PM, PM₁₀, and PM_{2.5} forms:

- multiplying each abrasive blasting media maximum daily usage limit (lb/day) proposed in Permit Condition 6.2 by its PM emissions factor (lb PM/lb of abrasive blasting media), by one minus the blast filter unit control efficiency of 80% for PM, by the TAP content wt% of the abrasive blasting material, and then summing the emissions from all abrasive blasting materials (lb/day) for that TAP.
- multiplying each abrasive blasting media maximum daily usage limit (lb/day) proposed in Permit Condition 6.2 by its PM₁₀ emissions factor (lb PM₁₀/lb of abrasive blasting media), by one minus the blast filter unit control efficiency of 80% for PM₁₀, by the TAP content wt% of the abrasive blasting material, and then summing the total emissions from all abrasive blasting materials (lb/day) for that TAP.
- multiplying each abrasive blasting media maximum daily usage limit (lb/day) proposed in Permit Condition 6.2, by its PM_{2.5} emissions factor (lb PM/lb of abrasive blasting media), by one minus the blast filter unit control efficiency of 50% for PM_{2.5}, by the TAP content wt% of the abrasive blasting material, and then summing the total emissions from all abrasive blasting materials (lb/day) for that TAP.

The permittee shall provide supporting documentation for emissions factors that have not been approved by this permitting action.

6.10 Welding -TAP

- For each Daily Operation Scenario that uses an alternate welding electrode rod, for each TAP emitted from welding operation, the emissions shall be estimated by multiplying maximum daily usage limit of each welding electrode rod (lb/day) proposed in Permit Condition 6.2 by its fume emissions factor (lb PM₁₀/lb of electrode), by one minus overall control efficiency of 99.98% for PM, and by its TAP weight content wt%.

The permittee shall provide supporting documentation for emissions factors that have not

been approved by this permitting action.

Monitoring, Recordkeeping, and Reporting Requirements

6.11 Daily Operation Scenario

- Only one Daily Operation Scenario may be used each calendar day.
- The permittee shall not exceed any daily material usage limit proposed in Permit Condition 6.2 for the Daily Operation Scenario for that calendar day.

6.12 Daily Usage Monitoring and Recordkeeping

Each calendar day on which an alternate material is used, the permittee shall collect and maintain records of the quantity of each material as required in Permit Condition 6.2 for the Daily Operation Scenario to demonstrate compliance with the daily material usage limit proposed in Permit Condition 6.2 for that Daily Operation Scenario for that calendar day.

6.13 Daily Operation Scenario Reporting

Each year, the permittee shall submit a report by May 1st on all Daily Operation Scenarios used each calendar day during the previous 365-day period. The report shall include documentation supporting the compliance demonstrations relied upon for each Daily Operation Scenario. Documentation should be in sufficient detail, including documentation of all calculations, such that DEQ can verify the analysis. The report shall be titled "P-2018.0005 Project 61993 Permit-Required Compliance Report When Using Alternate Material" and shall be sent to:

DEQ State Office
Air Quality Division
1410 N. Hilton
Boise, ID 83706

7 General Provisions

General Compliance

7.1 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.]

7.2 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]

7.3 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

7.4 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

7.5 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]

7.6 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

- 7.7 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.
- 7.8 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.
- 7.9 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 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 and 4/11/15]

Monitoring and Recordkeeping

- 7.10 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

- 7.11 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

- 7.12 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

- 7.13 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

- 7.14 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

- 7.15 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

- 7.16 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]

Appendix A

Emission Limits ^(a)

Source Description	PM _{2.5} ^(b)		PM ₁₀ ^(c)		NO _x	VOC		Silica- quartz (14808-60-7)	Methanol	Individual HAP	Aggregate HAP	
	lb/day ^(e)	T/yr ^(d)	lb/day ^(e)	T/yr ^(d)	T/yr ^(d)	lb/day ^(e)	T/yr ^(d)	lb/hr (24-hr average)	T/yr ^(d)	T/yr ^(d)	lb/day ^(e)	T/yr ^(d)
Combustion Sources		0.11		0.11	1.45		8.0E-02					0.027
Cutting and Welding (Fabrication) ^{(e), (f)}		0.0026		0.0026	1.18							3.1E-04
Abrasive Blasting	1.73	0.22	5.02	0.65				6.16E-03				0
Painting Booth	4.06	0.53	4.06	0.53		387.86	50.4				19.7	2.6
Solvent Recycling							14.1		7.05			11.1
Total		0.87		1.29	2.63		64.60			7.1		13.7

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 Particulate matter with an aerodynamic diameter less than or equal to a nominal two and half (2.5) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.

d Tons per any consecutive 12-month period.

e. NO_x emissions from plasma cutting only

f Total emissions from welding, plasma cutting, and laser cutting

Appendix B

Chemical Components of Coating Materials in Table 5.2 of the Permit

PTE Daily Use (gal/day)	PTE Annual Use (gal/year)	Maker	Coating Material (see Notes)	Density	Solids	VOC (non-exempt)	methanol 67-56-1	acetone 67-64-1	Propyl alcohol 71-23-8	MEK 78-93-3	naphthalene 91-20-3	trimethyl benzene 95-63-6 25551-13-7	ethyl benzene 100-41-4	toluene 108-88-3	Phenol 108-95-2	methyl n-aryl ketone 110-43-0	butyl acetate 123-86-4	hexa-methylene diisocyanate monomer 822-06-0	xylene 1330-20-7	carbon black 1333-86-4	naphtha (petroleum) light aromatic 64742-95-6	VM&P naphtha 8032-32-4 64742-89-8 64742-88-7	silica - quartz 14809-60-7
4.20	1092	PPG	AMERCOAT 65 THINNER	7.26	0.00%	100.00%							16.00%	1%						90.00%			
4.20	1092	PPG	AMERCOAT 101 THINNER	7.43	0.00%	100.00%																	
4.20	1092	PPG	AMERCOAT 923 THINNER	6.84	0.00%	100.00%																	
5.25	1365	PPG	AMERCOAT 370 CURE (Primer)	7.84	80%	20%			20%							100.00%							
42.00	10920	PPG	AMERCOAT 370 PEARL GRAY RESIN (Primer)	15.69	63%	17%																	
2.83	882.5	PPG	AMERCOAT 866M ACCELERATOR	8.18	1.27%	96.77%																	
5.25	1365	PPG	AMERSHIELD CURE (Topcoat)	9.35	80.00%	10.00%																	
		PPG	AMERSHIELD BLACK RESIN	10.77	74.53%	25.47%															5.00%	5.00%	
		PPG	AMERSHIELD DEEP TINT RESIN	11.43	70.69%	20.31%					1.00%												
		PPG	AMERSHIELD LIGHT TINT RESIN	11.18	77.13%	22.87%					1.00%												
		PPG	AMERSHIELD NEUTRAL TINT RESIN	11.18	81.14%	18.86%																	
		PPG	AMERSHIELD BRIGHT RED RESIN	10.26	72.61%	27.39%																	
		PPG	AMERSHIELD TRINITY WHITE RESIN	11.18	74.87%	25.13%																	
42.00	10920	PPG	Composite Topcoat Finish Paint	11.43	81%	27%	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	20%	0.00	0.00	5%	0.00	0.00	
18.00	2600	Axalta	Axalta Lacquer Thinner	6.78	0.00%	74.00%	50.00%	26.00%					3.00%	19.00%						8.00%		4.00%	
116.53	30034.50																						

Futures Production Growth Factor 300.0%

Component Characteristics		If volatile, enter "1" max																					
Maker	Coating Material	Density	Solids	VOC (non-exempt)	methanol 67-56-1	acetone 67-64-1	Propyl alcohol 71-23-8	MEK 78-93-3	naphthalene 91-20-3	trimethyl benzene 95-63-6 25551-13-7	ethyl benzene 100-41-4	toluene 108-88-3	Phenol 108-95-2	methyl n-aryl ketone 110-43-0	butyl acetate 123-86-4	HDI Monomer 822-06-0	xylene 1330-20-7	carbon black 1333-86-4	naphtha (petroleum) light aromatic 64742-95-6	VM&P naphtha 8032-32-4 64742-89-8 64742-88-7	silica - quartz 14809-60-7		
		lb/gal	Pounds per Hour	Pounds per Hour																			
Hourly Spray Calculations (lb/hr) (Based on 24-hr averaging period, see sample calc below)	PPG	AMERCOAT 65 THINNER																					
	PPG	AMERCOAT 101 THINNER	7.43	0.00	1.30	0.000	0.000	0.000	0.000	0.130	0.022	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
	PPG	AMERCOAT 923 THINNER	6.84	0.00	1.20	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.197	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
	PPG	AMERCOAT 370 CURE (Primer)	7.84	1.37	0.34	0.000	0.000	0.343	0.000	0.000	0.000	0.000	0.000	0.022	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
	PPG	AMERCOAT 370 PEARL GRAY RESIN (Primer)	15.69	22.79	4.66	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
	PPG	AMERCOAT 866M ACCELERATOR	8.18	0.01	0.88	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
	PPG	AMERSHIELD CURE (Topcoat)	9.35	1.94	0.20	0.000	0.000	0.000	0.000	0.000	0.039	0.000	0.000	0.000	0.000	0.102	0.020	0.000	0.000	0.102	0.000	0.000	
	PPG	AMERSHIELD BLACK RESIN																					
	PPG	AMERSHIELD DEEP TINT RESIN																					
	PPG	AMERSHIELD LIGHT TINT RESIN																					
	PPG	AMERSHIELD NEUTRAL TINT RESIN																					
	PPG	AMERSHIELD BRIGHT RED RESIN																					
	PPG	AMERSHIELD TRINITY WHITE RESIN																					
	PPG	Composite Topcoat Finish Paint	11.43	16.23	5.48	0.000	0.000	0.000	0.000	0.200	0.000	0.000	0.000	0.000	0.000	4.001	0.000	0.000	1.000	0.000	0.000	0.000	
	Axalta	Axalta Lacquer Thinner	6.78	0.00	2.09	1.413	0.735	0.000	0.000	0.000	0.000	0.057	0.537	0.000	0.000	0.000	0.000	0.000	0.228	0.000	0.000	0.113	
	Spray Total (lb/hr)		42.248	16.161	1.413	0.735	0.343	0.000	0.330	0.081	0.057	0.537	0.022	1.197	4.103	0.020	0.228	1.000	0.102	0.113	0.000		

Maker	Coating Material	Density	Solids	VOC (non-exempt)	methanol 67-56-1	acetone 67-64-1	Propyl alcohol 71-23-8	MEK 78-93-3	naphthalene 91-20-3	trimethyl benzene 95-63-6 25551-13-7	ethyl benzene 100-41-4	toluene 108-88-3	Phenol 108-95-2	methyl n-aryl ketone 110-43-0	butyl acetate 123-86-4	HDI Monomer 822-06-0	xylene 1330-20-7	carbon black 1333-86-4	naphtha (petroleum) light aromatic 64742-95-6	VM&P naphtha 8032-32-4 64742-89-8 64742-88-7	silica - quartz 14809-60-7	
		lb/gal	Tons per Year	Tons per Year																		
Annual Spray Calculations (tons/yr) (See sample calc below)	PPG	AMERCOAT 65 THINNER																				
	PPG	AMERCOAT 101 THINNER	7.43	0.00	4.06	0.000	0.000	0.000	0.000	0.406	0.069	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
	PPG	AMERCOAT 923 THINNER	6.84	0.00	3.73	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	3.735	0.000	0.000	0.000	0.000	0.000	0.000	
	PPG	AMERCOAT 370 CURE (Primer)	7.84	4.28	1.06	0.000	0.000	1.070	0.000	0.000	0.000	0.000	0.000	0.070	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
	PPG	AMERCOAT 370 PEARL GRAY RESIN (Primer)	15.69	71.11	14.55	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
	PPG	AMERCOAT 866M ACCELERATOR	8.18	0.04	2.76	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
	PPG	AMERSHIELD CURE (Topcoat)	9.35	5.74	0.64	0.000	0.000	0.000	0.000	0.000	0.121	0.000	0.000	0.000	0.000	0.319	0.064	0.000	0.000	0.319	0.000	
	PPG	AMERSHIELD BLACK RESIN																				
	PPG	AMERSHIELD DEEP TINT RESIN																				
	PPG	AMERSHIELD LIGHT TINT RESIN																				
	PPG	AMERSHIELD NEUTRAL TINT RESIN																				
	PPG	AMERSHIELD BRIGHT RED RESIN																				
	PPG	AMERSHIELD TRINITY WHITE RESIN																				
	PPG	Composite Topcoat Finish Paint	11.43	50.64	17.09	0.000	0.000	0.000	0.000	0.624	0.000	0.000	0.000	0.000	0.000	12.482	0.000	0.000	3.120	0.000	0.000	
	Axalta	Axalta Lacquer Thinner	6.78	0.00	6.52	4.407	2.292	0.000	0.000	0.000	0.000	0.176	1.675	0.000	0.000	0.000	0.000	0.000	0.705	0.000	0.353	
	Spray Total (tons/yr)		131.81	50.42	4.41	2.29	1.07	0.00	1.03	0.18	0.18	1.67	0.07	3.73	12.80	0.06	0.71	3.12	0.32	0.35	0.00	

Notes: 5 days/week; 52 weeks/year
 1. Trinity Trailer estimated max primer use 14 gallons/day; 1 gallon primer:1 pint cure; for permit analysis assume 25 gallons/day
 Trinity Trailer estimated max topcoat use 14 gallons/day; 1 gallon topcoat:1 pint cure:8 ozs. Accelerator; for permit analysis assume 25 gallons/day
 2. Composite primer and composite tint based on max. physical and chemical characteristics of primer and tint, respectively

Appendix C

TAP Emissions Rates from All Sources without Using Any Alternative Material

Non-Carcinogenic Toxic Air Pollutant (24 hr Average)	TAP emissions (lb/hr) from each process based on the materials listed in the application						
	Combustion	Solvent Recycling	Abrasive Blasting	Plasma Cutting	Laser Cutting	Welding	Coating
Acetone							
Aluminum							
Barium							
Butyl Acetate							4.1E+00
Calcium Oxide			5.1E-02				
Carbon Black							4.0E-03
Chromium							
Cobalt							
Copper							
Dichlorobenzene							
Ethyl Benzene							
Heptane							
HMDI							
iron (oxide fume)							
Magnesium (oxide fume)							
Manganese							
Mercury							
Methanol		3.7E-03					1.4E+00
Methyl n-Amyl Ketone							1.2E+00
Molybdenum							
Naphthalene							
Pentane							
Phenol							
Propyl alcohol							3.4E-01
Selenium							
Silica- quartz			6.7E-03				0.0E+00
Silicon							
Silicon Dioxide			3.3E-01				
Toluene							
Trimethyl benzene							
Vanadium	1.9E-05						
VM&P Naphtha							
Xylene							
Zinc							
Carcinogenic Toxic Air Pollutant (Annual Average)	Carcinogenic Toxic Air Pollutant(Annual Average)						
	Combustion	Solvent Recycling	Abrasive Blasting	Plasma Cutting	Laser Cutting	Welding	Coating
Arsenic							
Benzene							
Beryllium							
Cadmium	3.6E-06						
Chromium+6				1.2E-09	4.3E-08	0.0E+00	
Formaldehyde	2.5E-04						
3-Methylchloranthene							
Nickel	7.0E-06			1.2E-05	7.3E-06	9.8E-08	
Polyaromatic Hydrocarbon (Max)							
Polycyclic Organics: 7-PAH Group	3.8E-08						