



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR  
TONI HARDESTY, DIRECTOR

March 15, 2007

**Certified Mail No. 7005 1160 0000 1550 2058**

Dave Yoder  
Jayco, Inc.  
621 Washington Street South  
Twin Falls, Idaho 83301

RE: Facility ID No. 083-00097, Jayco, Inc., Twin Falls  
Final Permit Letter

Dear Mr. Yoder:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-060452 to Jayco, Inc., in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on November 15, 2006. This permit is effective immediately. This permit does not release Jayco, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Twin Falls Regional Office at 1363 Fillmore Street, Twin Falls, Idaho 83301.

A representative of the Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Tracy Drouin at (208) 373-0502 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

MSVTD\bf      Project No. P-060452

Enclosures

c: Stephen Vanzandt, Twin Falls Regional Office  
Bill Rogers, Permit Coordinator  
Tracy Drouin, Permit Writer  
Marilyn Seymore/ Pat Rayne, Air Quality Division  
Laurie Kral, US EPA Region 10  
Permit Binder  
Source File  
Phyllis Heitman (Ltr Only)  
Reading File (Ltr Only)



**Air Quality  
PERMIT TO CONSTRUCT  
State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** P-060452  
**FACILITY ID No.:** 083-00097  
**AQCR:** 64                      **CLASS:** B  
**SIC:** 3792                      **ZONE:** 11  
**UTM COORDINATE (km):** 712.48, 4712.89

**1. PERMITTEE**

Jayco, Inc.

**2. PROJECT**

Initial Permit to Construct

**3. MAILING ADDRESS**

621 Washington Street South

**CITY**

Twin Falls

**STATE**

ID

**ZIP**

83301

**4. FACILITY CONTACT**

John Auld

**TITLE**

Safety and Environmental Affairs Manager

**TELEPHONE**

(574) 825-0566

**5. RESPONSIBLE OFFICIAL**

Dave Yoder

**TITLE**

General Manager

**TELEPHONE**

(574) 825-0566

**6. EXACT PLANT LOCATION**

510 Hankins Road

**COUNTY**

Twin Falls

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Recreational vehicle manufacturing facility

**8. GENERAL CONDITIONS**

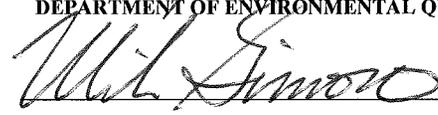
This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the 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.

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

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

  
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**TRACY DROUIN, PERMIT WRITER  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

  
 \_\_\_\_\_  
**MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:** March 15, 2007

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**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060452**

<b>Permittee:</b>	Jayco, Inc.	<b>Facility ID No. 083-00097</b>
<b>Location:</b>	Twin Falls, Idaho	

**Acronyms, Units, and Chemical Nomenclature**

AAC	acceptable ambient concentration
AACC	acceptable ambient concentrations for carcinogens
AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
HAP	hazardous air pollutant
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
lb/yr	pounds per year
MMBtu	million british thermal unit
MMCF/yr	million cubic feet per year
MSDS	Material Safety Data Sheet(s)
NO <sub>x</sub>	nitrogen oxides
O&M	operations and maintenance
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
RV	recreational vehicle
SIC	Standard Industrial Classification
T/yr	tons per any consecutive 12-month period
TAP	toxic air pollutant
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060452**

**Permittee:** Jayco, Inc.

**Location:** Twin Falls, Idaho

**Facility ID No. 083-00097**

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

1.1 This PTC is for the construction and operation of a recreational vehicle (RV) manufacturing facility in Twin Falls, Idaho. This is the facility's initial permit

***Regulated Sources***

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

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	RV Assembly Line	None
3	Woodworking Operations	Dust Collector
4	Fuel Burning Equipment*	None

\*Not a significant source

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060452**

<b>Permittee:</b> Jayco, Inc.	<b>Facility ID No. 083-00097</b>
<b>Location:</b> Twin Falls, Idaho	

**2. RV ASSEMBLY LINE EU-L1**

**2.1 Process Description**

The RV assembly line (EU-L1) includes adhesive application by spraying or rollcoating to secure parts, degreasing/solvent wiping to clean aluminum and fiberglass prior to applying decals, caulking to seal joints, touch-up and repair painting for scratches and maintenance (plastic, fiberglass, wood and metal substrates).

**2.2 Emissions Control Description**

**Table 2.1 EMISSIONS CONTROL DESCRIPTION FROM RV ASSEMBLY LINE**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
RV Assembly Line EU-L1	None	Fugitive

***Emissions Limits***

**2.3 HAP Emissions Limits**

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

**2.4 VOC Emissions Limit**

VOC emissions from the facility shall not exceed 95 tons per any consecutive 12-month period (T/yr).

**2.5 TAP Emissions Limit**

TAP emissions increment from the facility shall remain below each respective ambient increment (AAC or AACC) as listed in IDAPA 58.01.01.585-586.

***Operating Requirements***

**2.6 Throughput Limit**

The maximum number of RV's produced per day shall not exceed 32.

**2.7 Work Practices**

The permittee shall keep all VOC product containers covered/closed when not in use.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060452**

**Permittee:** Jayco, Inc.

**Location:** Twin Falls, Idaho

**Facility ID No. 083-00097**

**2.8 Material Purchase Records**

The permittee shall maintain the purchase records of all RV assembly line materials that contain HAPs, TAPs, and/or VOCs including but not limited to, adhesives, caulks, degreasers, solvents, and paints. The purchase records shall remain on site and shall be made available to DEQ representatives upon request.

**2.9 Material Safety Data Sheets**

The permittee shall maintain the MSDS' for the RV assembly line materials purchases and used at the facility for a period of five years. If the constituents of any product are changed, a record of the date of commencement of usage of the new product shall be kept as well as both the old and new MSDS'. The MSDS' shall remain on site at all times and shall be made available to DEQ representatives upon request.

***Monitoring and Recordkeeping Requirements***

**2.10 Throughput Monitoring**

The permittee shall monitor and record the number of RVs produced per day to demonstrate compliance with Permit Condition 2.6. Records of this information shall remain onsite and shall be made available to DEQ representatives upon request.

**2.11 Material Usage Records**

The permittee shall monitor and record monthly, the usage of each RV assembly line material that contains HAPs, TAPs, and/or VOCs. The usage records shall remain on site and shall be made available to DEQ representatives upon request.

**2.12 HAP Monitoring Requirements**

The permittee shall monitor and record the monthly and annual HAP emissions from the RV assembly line using the purchase records required by Permit Condition 2.8, the MSDS' required by Permit Condition 2.9, and the material usage records required by Permit Condition 2.11 to demonstrate compliance with Permit Condition 2.3. Records of this information shall be maintained on and shall be made available to DEQ representatives upon request.

**2.13 VOC Monitoring Requirements**

The permittee shall monitor and record the monthly and annual VOC emissions from the RV assembly line using the purchase records required by Permit Condition 2.8, the MSDS' required by Permit Condition 2.9 and the material usage records required by Permit Condition 2.11 to demonstrate compliance with Permit Condition 2.4. Records of this information shall be maintained on site and shall be made available to DEQ representatives upon request.

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<b>Location:</b>	Twin Falls, Idaho	

**2.14 TAP Monitoring Requirements**

The permittee shall monitor and record the monthly and annual TAP emissions from the RV assembly line using the purchase records required by Permit Condition 2.8, the MSDS' required by Permit Condition 2.9, and the material usage records required by Permit Condition 2.11 to demonstrate compliance with Permit Condition 2.5. Records of this information shall be maintained on site and shall be made available to DEQ representatives upon request.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060452**

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<b>Location:</b>	Twin Falls, Idaho	

**3. WOODWORKING OPERATION EU W-1**

**3.1 Process Description**

The woodworking operation (EU W-1) consists of various saws, routers, and milling equipment and is equipped with a dust collector that vents internally. The physical design capacity for woodworking operations is 5,000 pounds of wood material per hour.

**3.2 Emissions Control Description**

A woodworking operation dust collector (CE-1), located and vented to the interior of the building, controls PM<sub>10</sub> from woodworking operations. Table 3.1 shows the emission unit and any associated control device.

**Table 3.1 EMISSIONS CONTROL DESCRIPTION FROM WOODWORKING**

<b>Emissions Unit(s)/Processes</b>	<b>Emissions Control Device</b>	<b>Emission Point</b>
Woodworking operation	Dust Collector (PM <sub>10</sub> )	Vented to interior of building

***Emissions Limits***

**3.3 PM Emissions Limit**

Emissions of PM from woodworking shall comply with process weight limits in accordance with the provisions of IDAPA 58.01.01.700-703 using the following equation:

$$E = 0.045(PW)^{0.60}$$

Where:

- E = the allowable emission from the entire source in pounds per hour, and
- PW = the process weight in pounds per hour.

**3.4 Visible Emissions**

Visible emissions from any stack, vent, or functionally equivalent opening associated woodworking operations, 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 Throughput Limit**

Wood material to be processed shall not exceed 5,000 lb/hr.

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**3.6 Fugitive Dust**

The permittee shall reasonably control emissions of fugitive dust from the facility in accordance with IDAPA 58.01.01.650-651.

**3.7 Dust Collector Operations**

The dust collector listed in Table 3.1 shall be operated whenever woodworking operations occur.

**3.8 Dust Collector Maintenance**

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

**3.9 Operations and Maintenance Manual**

Within 60 days after startup, the permittee shall have developed an operations and maintenance manual for the dust collector, which describes the procedures that will be followed to comply with the manufacturer's specifications. The manual shall include, at a minimum, a general description of the dust collector; normal operating conditions and procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; and provisions for annual inspections. The manual shall remain onsite at all times and shall be made available to DEQ representatives upon request. Once developed, a draft copy of the manual shall be submitted for review to DEQ's Twin Falls Regional Office at the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Twin Falls Regional Office  
1363 Fillmore Street  
Twin Falls, ID 83301

***Monitoring and Recordkeeping Requirements***

**3.10 Throughput Monitoring**

The permittee shall monitor and record the daily amount of wood material processed to demonstrate compliance with Permit Condition 3.8. Records of this information shall remain on site and shall be made available to DEQ representatives upon request.

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<b>Location:</b>	Twin Falls, Idaho

**Facility ID No. 083-00097**

**4. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

***General Compliance***

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.  

**[Idaho Code §39-101, et seq.]**
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.  

**[IDAPA 58.01.01.211, 5/1/94]**
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.  

**[IDAPA 58.01.01.212.01, 5/1/94]**

***Inspection and Entry***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

**[Idaho Code §39-108]**

***Construction and Operation Notification***

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

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**Permittee:** Jayco, Inc.

**Location:** Twin Falls, Idaho

**Facility ID No. 083-00097**

- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

**[IDAPA 58.01.01.211, 5/1/94]**

***Performance Testing***

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

**[IDAPA 58.01.01.157, 4/5/00]**

***Monitoring and Recordkeeping***

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

**[IDAPA 58.01.01.211, 5/1/94]**

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<b>Location:</b>	Twin Falls, Idaho	

***Excess Emissions***

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

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

***Certification***

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

**[IDAPA 58.01.01.123, 5/1/94]**

***False Statements***

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

**[IDAPA 58.01.01.125, 3/23/98]**

***Tampering***

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

**[IDAPA 58.01.01.126, 3/23/98]**

***Transferability***

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

**[IDAPA 58.01.01.209.06, 4/11/06]**

***Severability***

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.