

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** Criterion Trailers LLC  
**Permit Number** P-2014.0026  
**Project ID** 62141  
**Facility ID** 027-00145  
**Facility Location** 20394 Pinto Lane  
Caldwell, Idaho 83606

### 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** November 16, 2018



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**Dan Pitman, Permit Writer**



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**Mike Simon, Stationary Source Manager**

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# 1 Permit Scope

## Purpose

- 1.1 This is a revised permit to construct (PTC) to change the ownership of an existing, operating prefabricated metal building and components manufacturing operation. The facility also manufactures steel tanks. Operations include metal working, welding and painting. The facility receives various forms of steel, and machines the steel into tanks and enclosures.
- 1.2 This PTC replaces Permit to Construct No. P-2014.0026, issued on January 22, 2016.

## Regulated Sources

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

**Table 1.1 Regulated Sources**

Permit Section	Source	Control Equipment
-	Heater – 0.288 MMBtu/hr Natural Gas Fired	None
-	Boiler – 0.15 MMBtu/hr Natural Gas Fired	None
2	Welding Operations – various equipment	3 or more sided enclosure
2	Abrasive Blasting Operations	3 or more sided enclosure
2	Plasma Cutting Operations	3 or more sided enclosure
2	Spray Painting Operations	Booths with filters
3	Diesel Generator – 755 BHP Manufacturer – Cummins Power Emergency Power Only Tier 2 Certified	None
4	Gasoline Dispensing Tank Capacity – 50 gallons	Comply with NSPS

## **2 HAP & TAP Emissions Sources - Including Metal Fabrication & Painting**

### **2.1 Process Description**

Criterion Trailers LLC is engaged in prefabricated metal building and component manufacturing. The facility includes welding operations, abrasive blasting, plasma cutting, painting, a diesel generator, a heater and a boiler. These emissions source emit both toxic air pollutants (TAPs) and hazardous air pollutants (HAPs).

### **2.2 Control Device Descriptions**

Particulate matter emissions from welding, blasting, and plasma cutting operations are controlled by operating in a 3 or more sided enclosure.

Particulate matter emissions from spray painting operations are controlled by conducting operations within booths equipped with filters.

## **Emission Limits**

### **2.3 Toxic Air Pollutant (TAP) Limits**

Each calendar day emissions of TAPs from the facility, including but not limited to TAPs emissions from metal fabrication, paints, thinner, welding, the generator, the heater and boiler shall not exceed the EL (lb/hr) multiplied by 24 (for TAPs listed in both IDAPA 58.01.01.585 and 586) or the acceptable ambient concentration ( $\text{mg}/\text{m}^3$ ) (for TAPs listed in IDAPA 58.01.01.585) and the acceptable ambient concentration for carcinogens ( $\mu\text{g}/\text{m}^3$ ) (for TAPs listed in IDAPA 58.01.01.586).

### **2.4 Hazardous Air Pollutant (HAP) Limits**

Emissions of any single Hazardous Air Pollutant (HAP) from the entire facility shall not equal or exceed 10 tons per any consecutive 12-calendar month period.

Emissions of any combination of HAPs from the entire facility shall not equal or exceed 25 tons per any consecutive 12-calendar month period.

## **Operating Requirements**

**2.5** Particulate matter emissions from welding, abrasive blasting, and plasma cutting operations shall be controlled by operating in a 3 or more sided enclosure.

**2.6** Particulate matter emissions from spray painting operations shall be controlled by conducting operations within booths equipped with filters guaranteed by the manufacture to remove at least 95.56% of the particulate matter emitted from spray painting operations.

**2.7** The permittee shall not use more than 302 tons of abrasive for abrasive blasting operations per any 12 consecutive months. Abrasive material shall be Barton Garnet Abrasive Grains and Powders – Almandine and Pyrope Garnet or an alternative material provided the use of that alternative qualifies and complies with the permit to construct exemption criteria at IDAPA 58.01.01.220 – 223.

**2.8** The permittee shall not use more than 22,000 gallons of paint in any 12 consecutive calendar months.

## Monitoring and Recordkeeping Requirements

### 2.9 Material Usage Records

The permittee shall monitor and record daily the usage of all HAP and TAP containing materials that emit air pollution including but not limited to paints, thinners, and welding rod.

Each month the permittee shall monitor and record the tons of abrasive blasting material used during the previous 12 consecutive month period.

### 2.10 TAPs Emissions Monitoring Requirements

Using the material usage records, the permittee shall monitor and record the individual TAP (as listed in IDAPA 58.01.01.585 and 586) emissions from the facility in order to demonstrate compliance with the TAPs emissions limits in Permit Condition 2.3. All emissions calculations shall be maintained on-site in accordance with General Provision 5.10.

If any of the individual daily TAP emission rate exceeds 24 times the screening emissions level (EL) specified in IDAPA 58.01.01.585 and 586, a modeling analysis shall be conducted to demonstrate compliance with the acceptable ambient concentration (mg/m<sup>3</sup>) (for TAPs listed in IDAPA 58.01.01.585) or the acceptable ambient concentration for carcinogens (μg/m<sup>3</sup>) (for TAPs listed in IDAPA 58.01.01.586). Documentation of all calculations and modeling analysis shall be maintained on-site in accordance with General Provision 5.10.

2.11 Using the material usage records, each month the permittee shall monitor and record the individual and total HAP emissions from the facility in order to demonstrate compliance with the HAP emissions limits in Permit Condition 2.4. All emissions calculations shall be maintained on-site in accordance with General Provision 5.10.

2.12 The permittee shall maintain on-site and make available to DEQ representatives upon request a manufacturer's guarantee that the filters in booths, where spray painting operations occur, remove at least 95.56% of the particulate matter emitted from spray painting operations.

## Reporting Requirements

2.13 Each year the permittee shall submit a report by May 1<sup>st</sup> on all TAP modeling analyses that have been conducted during the previous 12 month period. The report shall document the analyses with sufficient detail, including documentation of all calculations and electronic copies of modeling files, so that DEQ can verify the analysis. The report shall be sent to:

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

The report shall be titled: Criterion Trailers LLC – Permit Required Modeling Report.

### 2.14 Excess Emissions

If a TAP modeling analysis (conducted pursuant to Permit Condition 2.10) shows that emissions of any TAP exceeds the acceptable ambient concentration for any TAP, the permittee shall follow the excess emissions requirements of IDAPA 58.01.01.131 including but not limited to correcting the excess emission condition in accordance with IDAPA 58.01.01.132, and submitting excess emission reports no later than 15 days after the beginning of each such event in accordance with IDAPA 58.01.01.135.

### 3 Emergency Engine

#### 3.1 Process Description

The permittee may utilize an engine to provide power during emergency situations (Table 3.1).

Table 3.1 Emergency Engine and Emissions Control Device Description

Emissions Unit / Process	Emissions Control Device
Diesel Generator – 755 BHP Manufacturer – Cummins Power	None

#### Compliance Date

#### 3.2 Emission Limits

In accordance with 40 CFR 63.6595(a)(1), the emergency engine must comply with the applicable emission and operating limitations of the National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ by May 3, 2013.

#### 3.3 Standard Summary

In accordance with 40 CFR 63.6603(a), on and after May 3, 2013, the following emission limits or operating restrictions are required for the stationary emergency CI RICE. The permittee must meet the following requirements, except during periods of startup.

- Change oil and filter every 500 hours of operation or annually, whichever comes first.
- Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first.
- Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

#### Operating Requirements

3.4 In accordance with 40 CFR 63.6605, the permittee shall, at all times, operate and maintain the engine, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

3.5 In accordance with 40 CFR 63.6625(e)(3), the permittee must operate and maintain the engine, and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

3.6 In accordance with 63.6625(f) the permittee must install a non-resettable hour meter if one is not already installed.

- 3.7 In accordance with 40 CFR 63.6625(h), time spent at idle during startup shall be minimized to a period needed for appropriate and safe loading of the engine, but not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 2d to 40 CFR 63 Subpart ZZZZ apply.
- 3.8 In accordance with 40 CFR 63.6625(i), the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in the Standard Summary permit condition. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the stationary emergency RICE owner or operator is not required to change the oil. If any of the limits are exceeded, the stationary emergency RICE owner or operator must change the oil within 2 days of receiving the results of the analysis; if the stationary emergency RICE is not in operation when the results of the analysis are received, the stationary emergency RICE owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the stationary emergency RICE. The analysis program must be part of the maintenance plan for the stationary emergency RICE.
- 3.9 In accordance with 40 CFR 63.6640(f), in order to be considered an emergency generator the permittee shall operate the emergency engine as follows:
1. There is no time limit on the use of emergency stationary RICE in emergency situations.
  2. The permittee may operate the stationary emergency RICE for the purposes of maintenance checks and readiness testing, provided the tests are recommended by Federal, State or local government, the manufacturer, the vendor or the insurance company associated with the stationary emergency RICE. Maintenance checks and readiness testing of such units is limited to 100 hours per year.
  3. The permittee may operate the emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hour per year provided for maintenance and testing.
- 3.10 The permittee shall operate in accordance with the requirements to be considered an emergency engine as specified in 40 CFR 63.6640(f). If the permittee elects to operate in a nonemergency engine capacity a permit application shall be submitted prior to the change in status to include the 40 CFR 63 Subpart ZZZZ requirements that are applicable to nonemergency engines.

### **Monitoring and Recordkeeping Requirements**

- 3.11 In accordance with 40 CFR 63.6655(e), the permittee must keep records of the maintenance conducted on the engine in order to demonstrate that the permittee operated and maintained the engine and after-treatment control device (if any) according to the maintenance plan.

In accordance with 40 CFR 63.6655(f), an existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines, the permittee must keep records of the hours of operation of the stationary emergency RICE that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation; including what classified the operation as emergency and how many hours are spent for non-emergency operation. If engines are used for demand response, the

permittee must keep records of the notification of the emergency situation, and the time the stationary emergency RICE was operated as part of demand response.

All records shall be readily accessible in hard copy or electronic form for a minimum of five (5) years after the date of each occurrence, measurement, maintenance procedure, corrective action or report in accordance with 40 CFR 63.6660.

#### **40 CFR 63, Subpart A**

- 3.12** Table 8 of 40 CFR 63, subpart ZZZZ lists all General Provisions of 40 CFR 63, Subpart A which apply.

In accordance with 40 CFR 63.6640(e) the permittee shall report each instance that it did not meet the requirements of Table 8 of 40 CFR 63, subpart ZZZZ.

- 3.13** Any notifications or reporting required by 40 CFR 63, Subpart ZZZZ or Subpart A – General Provisions shall be submitted to the following addresses:

Air Quality Permit Compliance

Boise Regional Office

Department of Environmental Quality

1445 N. Orchard

Boise, ID 83706

Phone: (208) 373-0550

Fax: (208) 373-0287

and

EPA Region 10

Air Operating Permits, OAQ-107

1200 Sixth Ave.

Seattle, WA 98101

- 3.14** Should there be conflict between permit conditions that reference CFR provisions and the CFR, the CFR shall govern including any amendments to the CFR.

## 4 Gasoline Dispensing Tank

- 4.1 The permittee operates a 50 gallon gasoline dispensing tank that is subject to the requirements of 40 CFR 63, Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities.

In accordance with 40 CFR 63.11112, the emission sources to which this subpart applies are gasoline storage tanks and associated equipment components in vapor or liquid gasoline service at existing gasoline dispensing facilities (GDF) that meet the criteria specified in § 63.11111. Pressure/Vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at GDF are covered emission sources. The equipment used for the refueling of motor vehicles is not covered by this subpart.

### Compliance Date

- 4.2 In accordance with 40 CFR 63.11113 the existing affected gasoline dispensing tank shall comply with the applicable provisions of 40 CFR 63, Subpart CCCCCC no later than January 10, 2011.

### Operating Requirements

- 4.3 In accordance with 40 CFR 63.1116(a) if monthly gasoline throughput is less than 10,000 gallons, the permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for an extended period of time. Measures to be taken include, but are not limited to, the following:
- 1) Minimize gasoline spills;
  - 2) Clean up spills as expeditiously as practicable;
  - 3) Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use. Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with this section; and
  - 4) Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
- 4.4 In accordance with 40 CFR 63.11115(a), the permittee must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

### Monitoring Requirements

- 4.5 In accordance with 40 CFR 63.11111(e), the permittee shall monitor and record monthly throughput of gasoline from the gasoline storage tank. Records required under this paragraph shall be kept for a period of five years.
- 4.6 In accordance with 40 CFR 63.11125(d), the Permittee shall keep records as specified below:
- Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
  - Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning

process and air pollution control and monitoring equipment to its normal or usual manner of operation.

- 4.7 In accordance with 40 CFR 63.11126(b), the permittee shall report, by March 15 of each year, the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.11115(a), including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred.

**40 CFR 63, Subpart A**

- 4.8 Table 3 of 40 CFR 63, subpart CCCCCC lists all General Provisions of 40 CFR 63, Subpart A which apply.
- 4.9 Any notifications or reporting required by 40 CFR 63, Subpart CCCCCC or Subpart A – General Provisions shall be submitted to the following addresses:

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

and

EPA Region 10  
Air Operating Permits, OAQ-107  
1200 Sixth Ave.  
Seattle, WA 98101

The Department is not delegated this Subpart.

- 4.10 Should there be conflict between permit conditions that reference CFR provisions and the CFR, the CFR shall govern including any amendments to the CFR.

## 5 General Provisions

### General Compliance

5.1 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.]

5.2 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]

5.3 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

5.4 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

5.5 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]

5.6 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; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- 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.

[IDAPA 58.01.01.211.03, 5/1/94]

## Performance Testing

- 5.7 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.
- 5.8 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.
- 5.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

## Monitoring and Recordkeeping

- 5.10 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

- 5.11 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**

- 5.12 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**

- 5.13 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**

- 5.14 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**

- 5.15 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**

- 5.16 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]