BIO-WEST, Inc.

1063 West 1400 North
Logan, Utah
84321-2291
Ph: 435.752.4202
Fx: 435.752.0507
www.bio-west.com

Coastal Ecology and Marine Biology

Environmental Analysis and Permitting

Geology/ Hydrogeology and Remediation

Fisheries and Aquatic Ecology

GIS Planning and Analysis

Landscape Architecture and Environmental Planning

Vegetation Resources

Watershed Sciences

Wetland Resources

Wildlife Resources

RECEIVED
MAR 0 8 2016
DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A Q PROGRAM

✓ 17852 1000. -2C
✓ 17853 500.00-2C

RECEIVED
FEB 2 9 2016

February 25, 2016

Air Quality Program Office-Application Processing
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

Subject: ***Automotive Coating Operations General Permit to Construct***
Trails West Manufacturing of Idaho, Inc.
Industrial Park Drive Facility (Facility 2)
950 West Industrial Park Drive
Preston, Idaho 83263
BIO-WEST Project No. 1992

Greetings:

BIO-WEST, Inc. (BIO-WEST) has been contracted by Trails West Manufacturing of Idaho, Inc. (Trails West) to complete a Permit to Construct for the Trails West trailer manufacturing facility (Facility 2) located at 950 West Industrial Park Drive in Preston, Idaho. This is a new manufacturing facility that will be used in conjunction with the Trails West trailer manufacturing facility (Facility 1) located at 65 North 800 West in Preston, Idaho. Trails West has an air quality permit in place for Facility 1, however Facility 2 is located approximately 0.75 miles away and is not located on or adjacent to Facility 1. Therefore, a new air quality permit is required for Facility 2. Form GI containing specific information for Facility 2 is included as Attachment 1.

Trails West would like to start production at Facility 2 by April 1, 2016. BIO-WEST is currently preparing a custom Permit to Construct for the painting operations at the Facility 2. However, due to the extended timeframe for approval of a custom Permit to Construct, Trails West is applying for an Automotive Coating Operations General Permit to Construct at this time in order to start manufacturing operations at Facility 2 as soon as possible. The Automotive Coating Operations General Permit to Construct will allow Trails West to begin painting operations at the facility on a limited basis. Trails West understands that the Automotive Coating Operations General Permit to Construct will limit the painting operations at the facility to 4 gallons per day. The custom Permit to Construct application for Facility 2 will be submitted for approval at a later date.

As part of the trailer manufacturing process at Facility 2, two paint booths will be used to apply primer and paint to the trailers. The primer booth is a cross draft booth with a booth heater and one exhaust stack. The paint booth is a side downdraft booth with two booth heaters and four exhaust stacks. Forms EU6 containing specific information for each paint booth is included as Attachment 1. Documentation from the paint booth filter manufacturer supporting the control efficiency of the filters is included as Attachment 2.

If you have any questions or comments, please call the BIO-WEST office.

Sincerely,

RECEIVED
FEB 2 9 2016

Dustin Lofthouse
Hydrogeologist

Attachment 1: IDEQ Automotive Coating Operations General Permit to Construct Forms
Attachment 2: Paint Booth Filter Control Efficiency Documentation

c: Jon Reeder, Trails West

RECEIVED
FEB 2 9 2016

Attachment 1:

IDEQ Automotive Coating Operations General Permit to Construct Forms

DEQ AIR QUALITY PROGRAM
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline: 1-877-5PERMIT

RECEIVED
FEB 29 2016

Please see instructions on back page before filling out the form. All information is required. If information is missing, the application will not be processed.

Identification

1. Facility name: Trails West Manufacturing of Idaho, Inc. Facility 2

2. Existing facility identification number:

☒ **Check if new facility (not yet operating)**

3. Brief project description: Install two paint booths at a trailer manufacturing facility (new construction).

Facility Information

4. Primary facility permitting contact name: Jon Reeder/General Manager

Contact type: Responsible official

Telephone number: 208-852-2200

E-mail: jonr@trailswesttrailers.co

5. Alternate facility permitting contact name: Jay Layland/Production Manager

Alternate contact type: Facility permitting contact

Telephone number: 208-852-2200

E-mail: jayl@trailswesttrailers.com

6. Mailing address where permit will be sent (street/city/county/state/zip code): P.O. Box 67, Preston, Idaho 83263

7. Physical address of permitted facility (if different than mailing address) (street/city/county/state/zip code): 950 West Industrial Park Drive, Preston, Idaho 83263

8. Is the equipment portable? ☐ **Yes*** ☒ **No** ***If yes, complete and attach PERF; see instructions.**

9. NAICS codes: **Primary NAICS**: 336214 **Secondary NAICS**: 336212

10. Brief business description and principal product produced: Horse, stock, and snowmobile trailer manufacturing.

11. Identify any adjacent or contiguous facility this company owns and/or operates: none

12. Specify type of application ☒ **Permit to construct (PTC); application fee of $1,000 required. See instructions.**

☐ **Tier I permit** ☐ **Tier II permit** ☐ **Tier II/Permit to construct**

For Tier I permitted facilities only: If you are applying for a PTC then you must also specify how the PTC will be incorporated into the Tier I permit.

☐ **Co-process Tier I modification and PTC** ☐ **Incorporate PTC at the time of Tier I renewal** ☐ **Administratively amend the Tier I permit to incorporate the PTC upon applicant's request (IDAPA 58.01.01.209.05.a, b, or c)**

Certification

In accordance with IDAPA 58.01.01.123 (Rules for the Control of Air Pollution in Idaho), I certify based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

13. Responsible official's name: Jon Reeder **Official's title**: General Manager

Official's address: P.O. Box 67, Preston, Idaho 83263

Telephone number: 208-852-2200 **E-mail**: jonr@trailswesttrailers.com

Official's signature: Jon Reeder **Date**: 3-2-2016

☐ **14. Check here to indicate that you want to review the draft permit before final issuance.**

DEQ AIR QUALITY PROGRAM
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

Emissions Units – Automotive Coating Information **Form EU6**
Revision 5
2/22/11

Complete this form for each paint booth. Please see instructions on page 2 before filling out the form.

IDENTIFICATION

1. Company Name	2. Facility Name:
Trails West Manufacturing of Idaho, Inc.	Trails West Industrial Park Drive Facility (Facility 2)

3. Brief Project Description: Install a paint primer booth at a trailer manufacturing facility (new construction).

PAINT BOOTH INFORMATION

4. Booth Data:
☒ New Booth ☐ Unpermitted Existing Booth If an existing booth, when was it installed? _____
☐ Modification to a Permitted Booth, Permit #: _____ Date Permit Issued: _____
☒ Dry Filters? ☐ Dry Filters w/ a Wet Wall? ☐ Wet Wall only? ☐ Other, provide details: _____
Booth Airflow Type: ☐ Down draft ☐ Semi-Downdraft ☐ Side draft ☒ Other, provide details: Cross Draft

5. Booth Information: Manufacturer: AFC Finishing Systems Model: ECFCSD7042 Date Manufactured: 2/1/2016

6. Planned Construction Date (if applicable): ASAP, would like to start production by 4/1/2016

7. Is the booth equipped with a heater? No ☐ Go to the next section Yes ☒ If "yes", answer the following questions.
Heating method: ☐ Electricity, Go to the next section ☒ Combustion
Who is the manufacturer of the booth heater? AFC Finishing Systems MMBtu/hr What is the model number of the booth heater? DFM800R
What is the heat input rating of the booth heater? 1.075 MMBtu/hr What fuel is used in the booth heater (i.e., natural gas or LPG)? Natural Gas
Is the worst-case operation of the booth heater **greater than 2,080** hours per year? No ☒ Go to the next section Yes ☐
If "Yes", what is the worse-case annual operation of the burner? _____ hrs/yr

8. Are bed lining spray operations performed at this facility? No ☒ Go to the next section ☐ Yes, I am requesting an additional 4.0 gal/day limit for component "A" of a two stage "A + B" bed lining material.

SPRAY GUN DESCRIPTION AND SPECIFICATIONS

Gun No.	9. Manufacturer	10. Model	11. Type (e.g. HVLP, airless, conventional)	12. Gun Transfer Efficiency % per the manufacturer
1	Iwata	LPH 200-LVP	HVLP	65%
2				
3				
4				

REQUEST FOR PERMIT LIMITATIONS

13. Are you requesting a daily coating materials use permit limit (e.g. gallons per day)?
☒ Yes, I am requesting a limit of 4.0 gal/day for all coating materials used at the facility. Note: In order to receive an Automotive Coating general permit a daily materials use limit of **4.0 gal/day** is required.
☐ No, Note: You will need to apply for a permit tailored to the situation at your facility, not an Automotive Coating general permit (see previous question).

EMISSIONS CONTROL DEVICE (FILTER) DESCRIPTION AND SPECIFICATIONS

Stack Served	14. Filter Manufacturer	15. Model	16. PM_{10} Control Efficiency(%)[a.]
1	Air Flow Technology	68T	99.7%
2			
3			
4			

Note: a. Provide the filter manufacturer's documentation to support the control efficiency specified above.

PAINT STRIPPING ACTIVITIES

17. Is Methylene Chloride (MeCl) (CAS #75-09-2) used for paint stripping activities at this facility?
☒ No, Note: In order to receive an Automotive Coating general permit **no MeCl** paint stripping activities can be performed at the facility.
☐ Yes, Note: In order to receive an Automotive Coating general permit no MeCl paint stripping activities can be performed at the facility (see previous question). You will need to apply for a permit tailored to the situation at your facility, not an Automotive Coating general permit.

DEQ AIR QUALITY PROGRAM
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

Emissions Units – Automotive Coating Information **Form EU6**
Revision 5
2/22/11

Complete this form for each paint booth. Please see instructions on page 2 before filling out the form.

IDENTIFICATION

1. Company Name	2. Facility Name:
Trails West Manufacturing of Idaho, Inc.	Trails West Industrial Park Drive Facility (Facility 2)

3. Brief Project Description: Install a paint booth at a trailer manufacturing facility (new construction).

PAINT BOOTH INFORMATION

4. Booth Data:
☒ New Booth ☐ Unpermitted Existing Booth If an existing booth, when was it installed? _____
☐ Modification to a Permitted Booth, Permit #: _____ Date Permit Issued: _____
☒ Dry Filters? ☐ Dry Filters w/ a Wet Wall? ☐ Wet Wall only? ☐ Other, provide details: _____
Booth Airflow Type: ☒ Down draft ☐ Semi-Downdraft ☒ Side draft ☐ Other, provide details: _____

5. Booth Information: Manufacturer: AFC Finishing Systems Model: DTSDDDT7042 Date Manufactured: 2/1/2016

6. Planned Construction Date (if applicable): ASAP, would like to start production by 4/1/2016

7. Is the booth equipped with a heater? No ☐ Go to the next section Yes ☒ If "yes", answer the following questions.
Heating method: ☐ Electricity, Go to the next section ☒ Combustion
Who is the manufacturer of the booth heater? AFC Finishing Systems. Two heaters will be used in this booth. MMBtu/hr What is the model number of the booth heater? AMS 2000 (Both Heaters)
What is the heat input rating of the booth heater? 2.0 for each heater MMBtu/hr What fuel is used in the booth heater (i.e., natural gas or LPG)? Natural Gas
Is the worst-case operation of the booth heater **greater than 2,080** hours per year? No ☒ Go to the next section Yes ☐
If "Yes", what is the worse-case annual operation of the burner? _____ hrs/yr

8. Are bed lining spray operations performed at this facility? No ☒ Go to the next section ☐ Yes, I am requesting an additional 4.0 gal/day limit for component "A" of a two stage "A + B" bed lining material.

SPRAY GUN DESCRIPTION AND SPECIFICATIONS

Gun No.	9. Manufacturer	10. Model	11. Type (e.g. HVLP, airless, conventional)	12. Gun Transfer Efficiency % per the manufacturer
1	Iwata	LPH 200-LVP	HVLP	65%
2				
3				
4				

REQUEST FOR PERMIT LIMITATIONS

13. Are you requesting a daily coating materials use permit limit (e.g. gallons per day)?
☒ Yes, I am requesting a limit of 4.0 gal/day for all coating materials used at the facility. Note: In order to receive an Automotive Coating general permit a daily materials use limit of **4.0 gal/day** is required.
☐ No, Note: You will need to apply for a permit tailored to the situation at your facility, not an Automotive Coating general permit (see previous question).

EMISSIONS CONTROL DEVICE (FILTER) DESCRIPTION AND SPECIFICATIONS

Stack Served	14. Filter Manufacturer	15. Model	16. PM_{10} Control Efficiency(%)[a]
1	Air Flow Technology	68T	99.7%
2	Air Flow Technology	68T	99.7%
3	Air Flow Technology	68T	99.7%
4	Air Flow Technology	68T	99.7%

Note: a. Provide the filter manufacturer's documentation to support the control efficiency specified above.

PAINT STRIPPING ACTIVITIES

17. Is Methylene Chloride (MeCl) (CAS #75-09-2) used for paint stripping activities at this facility?
☒ No, Note: In order to receive an Automotive Coating general permit **no MeCl** paint stripping activities can be performed at the facility.
☐ Yes, Note: In order to receive an Automotive Coating general permit no MeCl paint stripping activities can be performed at the facility (see previous question). You will need to apply for a permit tailored to the situation at your facility, not an Automotive Coating general permit.

Attachment 2:

Paint Booth Filter Control Efficiency Documentation

PAINT ARRESTANCE FILTER TEST REPORT

Spray Removal Efficiency & Paint Holding Capacity

Tested for: **Air Flow Technology**

Filter Mfr.: **Air Flow Technology**

Filter Name/Model: **68T**

Report Date: **6-Nov-07**

Test Information

FILTER DESCRIPTION (20" x 20" pad):

2" Polyester

PAINT DESCRIPTION:

High Solids Baking Enamel(S.W.#1 Permaclad 2400,red)

PAINT SPRAY METHOD:

Conventional Air Gun at 40 PSI

SPRAY FEED RATE:

138 gr./min. **130** cc./min.

AIR VELOCITY:

150 FPM

Test Results

INITIAL PRESSURE DROP of Clean Test Filter

0.08 in. water

FINAL PRESSURE DROP of Loaded Test Filter

0.50 in. water

WEIGHT GAIN on TEST FILTER & Test Frame Trough

1969 grams

PAINT HOLDING CAPACITY of TEST FILTER

1793 grams = **4.0** lbs.

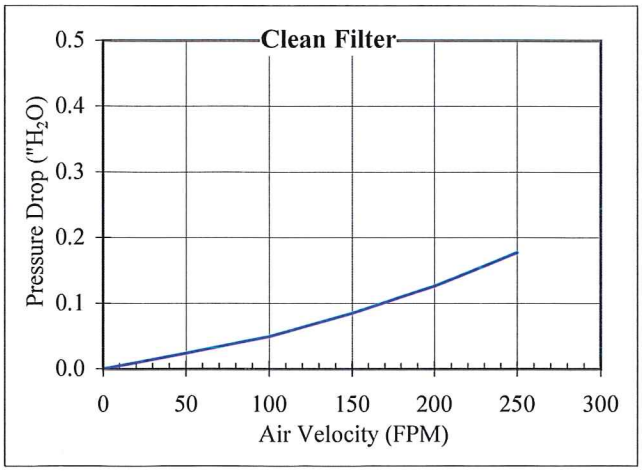
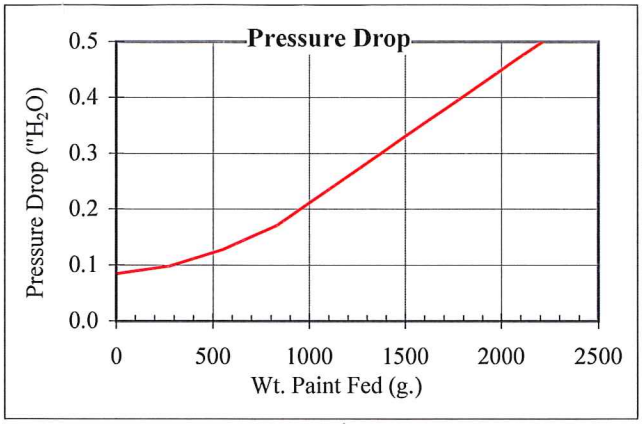
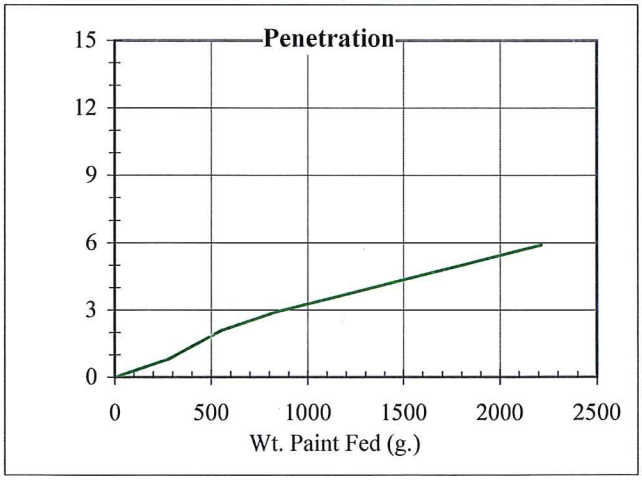
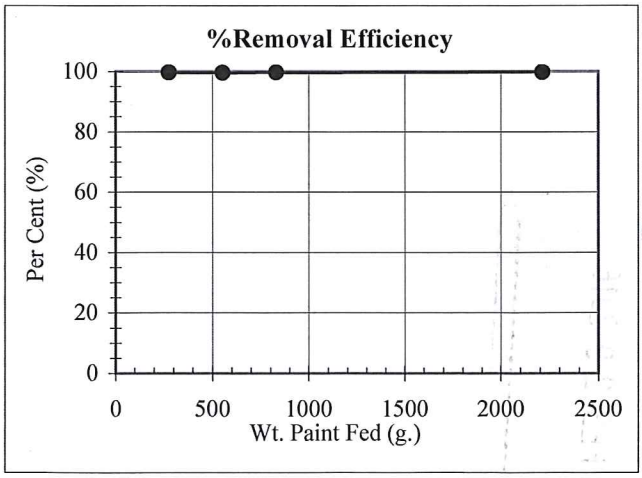
PAINT RUN-OFF

176 grams

WEIGHT GAIN - FINAL FILTER

5.9 grams = **PENETRATION**

AVERAGE REMOVAL EFFICIENCY of TEST FILTER

99.70 %

*The document represents filter analyses performed by AFT based upon paint arrestor results of comparable and interchangeable E12 and E12H 2" polyester filter products.