



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

April 26, 2017

Bret Jones, Owner
Classic Kitchens, Inc.
1170 Taylor Avenue, Suite 120
Meridian, Idaho 83642

RE: Facility ID No. 001-00340, Classic Kitchens, Inc., Meridian
Final Permit Letter

Dear Mr. Jones:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2017.0002 Project 61837 to Classic Kitchens, Inc., located at Meridian, for an initial PTC for an existing cabinet manufacturing operation. 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 17, 2017.

This permit is effective immediately. This permit does not release Classic Kitchens, Inc. 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 Thomas Krinke, Air Quality Compliance Officer, at (208) 373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

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

for, Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\tb
Permit No. P-2017.0002 PROJ 61837
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Classic Kitchens, Inc.
Permit Number P-2017.0002
Project ID 61837
Facility ID 001-00340
Facility Location 1170 Taylor Avenue, Suite 120
Meridian, Idaho 83642

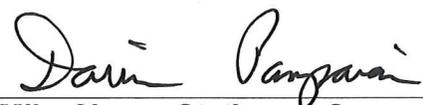
Permit Authority

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 April 26, 2017



Tom Burnham, 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 cabinet and cabinet parts coating operation.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source Description	Control Equipment Description
2	<p><u>Paint Booth: PB1</u> Manufacturer – Col-Met EFS Model: EIB-14-07-07-00-S Construction Date: 2016 Filter, Control Efficiency: 98.0% or greater Limit on the Type and Volume of Material Usage</p> <p><u>Paint Booth: PB2</u> Manufacturer: Col-Met EFS Model: EIB-14-07-07-00-S Construction Date: 2016 Filter, Control Efficiency: 98.0% or greater Limit on the Type and Volume of Material Usage</p> <p><u>Paint Booth: PB3</u> Manufacturer – Col-Met EFS Model: EIB-14-07-07-00-S Construction Date: 2016 Filter, Control Efficiency: 98.0% or greater Limit on the Type and Volume of Material Usage</p>	<p><u>Paint Booth filter media</u> Manufacturer – C.A. Technologies Model: Fiberglass 91-131 Filter, Control Efficiency: 98.7% or greater</p> <p><u>Spray Guns:</u> Manufacturer: C. A. Technologies Model: Cougar Type: Airless HVLP Transfer Efficiency: >40%</p>

2 Cabinet Coating Operations

2.1 Process Description

Classic Kitchens, Inc. is a cabinet manufacturer located in Meridian Idaho. At this location, doors, drawers, and molding for wooden cabinets and related items are painted in three enclosed spray booths with an HVLP paint gun. Heaters are electrically powered.

2.2 Control Device Descriptions

Table 2.1 Cabinet Coating Operations Description

Emissions Units / Processes	Control Devices	Emission Points
Paint Booth 1	Filter, 98.0% efficiency	Paintbooth 1 exhaust
Paint Booth 2	Filter, 98.0% efficiency	Paintbooth 2 exhaust
Paint Booth 3	Filter, 98.0% efficiency	Paintbooth 3 exhaust

Emission Limits

2.3 Coating Usage

The maximum allowable annual usage of each individual material shall not exceed the limits listed in Table 2.2 Coating usage for any 12-month consecutive period:

Table 2.2 Coating usage

Individual Material	Manufacturer	Maximum Annual Use (gallons)
MagnaMax Precatalyzed Pigmented Lacquer W29712	Campbell	600
High Performance WW Pre-Coat Clear Lacquer MC122242	Campbell	1986
MagnaClaw White Pre-Coat Primer/Undercoater W115749	Campbell	882
Quick Dry Vinyl Sealer C10189	Campbell	978
Standard Lacquer Thinner C16036	Campbell	260

The permittee may use alternate coatings and solvents that are not specifically listed in Table 2.2 provided:

- that the use of the alternate coating or solvent qualifies for an exemption from the need to obtain a permit to construct as specified at IDAPA 58.01.01.220-223, or
- that the use of the alternate coating or solvent is limited to quantities that would result in toxic air pollutant emissions equal to or below the screening emissions level (EL) listed in IDAPA 58.01.01.585 & 586.

2.6 Opacity Limit

Emissions from the stacks or functionally equivalent openings associated with the paint booths 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.

2.7 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.

Operating Requirements

2.8 Spray Gun and Spray Booth Filter System

- All coating at this facility shall be conducted within the booth area, with filter system in place, and exhaust fans operating.
- All painting shall be conducted with HVLP spray equipment with minimum 40% transfer efficiency as documented by the spray gun manufacturer.
- The permittee shall install, maintain, and operate according to the manufacturer's specifications and recommendations, a spray booth filter system or a preparation station filter system with a minimum control efficiency of 98.0% for PM₁₀ emissions as documented by the filter manufacturer.
- The permittee shall follow the operation and maintenance manual which will include the manufacturers specifications and procedures used to determine when replacement of the filters are required to maintain the 98.0% efficiency.

Monitoring and Recordkeeping Requirements

2.9 Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with the 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.

2.10 Material Usage Records

Using the purchase records, SDSs, and material usage records, the permittee shall monitor and record the gallons of coatings specified in Section 2.3 sprayed weekly in order to demonstrate compliance with the Table 2.2 Coating usage.

2.11 Calculating TAPs for Alternative Coatings

Prior to using alternate coatings not specified in Table 2.2 the permittee shall generate documentation that shows that the use of the alternate coating or solvent qualifies for an exemption in accordance with IDAPA 58.01.01.220.02; or calculate the amount of alternate coating or solvent containing 585 TAPs that may be used per calendar day and containing 586 TAPs that may be used per calendar month by using the following equations:

- For 585 TAPs that are volatile: Gallons/day = $[EL / (TAP\% / 100 \times \text{coating or solvent density})] \times 24$
- For 585 TAPs that are particulate: Gallons/day = $[EL / (TAP\% / 100 \times \text{coating or solvent density} \times (100\% - 40\% / 100) \times (100\% - 98\% / 100))] \times 24$
- For 586 TAPs that are volatile: Gallons/month = $[EL / (TAP\% / 100 \times \text{coating or solvent density})] \times (8760 / 12)$

- For 586 TAPs that are particulate: Gallons/month = $[EL / (TAP\%/100 \times \text{coating or solvent density} \times (100\%-40\%/100) \times (100\%-98\%/100))] \times (8760/12)$

Where:

Gallons/day = the amount of coating or solvent that may be used per calendar day

Gallons/month = the amount of coating or solvent that may be used per calendar month

EL = TAP allowable pounds per hour emission rate listed in IDAPA58.01.01.585 or 586

TAP% = the percentage of toxic air pollutant contained in the coating or solvent as given by the manufacturer

Density = the density of the coating or solvent in pounds per gallon

2.12 Weekly Monitoring of Alternative Coatings

The permittee shall monitor and record the gallons of alternate coatings used each calendar week that contain 585 TAPs and 586 TAPs. The gallons/week of alternate coatings that contain TAPs would be divided by the number of operating days each week to demonstrate that the use of alternate coatings did not exceed the maximum daily amounts calculated using the equations in the Calculating TAPs for Alternative Coatings permit condition.

2.13 Documentation of Alternative Coatings Records

Records of material safety data sheets (MSDS) or safety data sheets (SDS) for all TAP containing materials used for the cabinet coating operation shall be maintained onsite.

- If the MSDS or SDS for a material lists a range for a specific TAP content, then calculations shall use the highest value in the range.
- If the proposed daily use of alternate coatings with any of the individual non-carcinogenic TAPs or monthly use of individual carcinogenic TAPs calendar day total exceed the screening emissions level (EL) specified in IDAPA 58.01.01.585 or IDAPA 58.01.01.586, a modeling analysis shall be conducted to demonstrate that the amounts of alternate coatings comply with the acceptable ambient concentration (mg/m^3) (for TAPs listed in IDAPA 58.01.01.585 and IDAPA 58.01.01.586).
- Documentation of all calculations and modeling analysis shall be maintained on-site in accordance with General Provisions of this permit.

Reporting Requirements

2.14 Reporting Requirement

Each year the permittee shall submit a report by May 1st 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: Classic Kitchens, Inc. – Permit Required Modeling Report.

3 General Provisions

General Compliance

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

[Idaho Code §39-101, et seq.]

3.2 The permittee shall at all times (except as provided in the “Rules for the Control of Air Pollution in Idaho”) maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

3.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

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

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

[Idaho Code §39-108]

Construction and Operation Notification

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

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

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

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

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7** If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 3.8** All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 3.9** Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The 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

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

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

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

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

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

[IDAPA 58.01.01.123, 5/1/94]

False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

Transferability

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

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

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

[IDAPA 58.01.01.211, 5/1/94]