



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1445 North Orchard • Boise, Idaho 83706 • (208) 373-0550
www.deq.idaho.gov

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

May 23, 2017

Lou Feil, Vice President of Finance
Heartland RV – Plant 800
900 East Karcher Road
Nampa, ID 83687

RE: Facility ID No. 027-00151, Heartland RV- Plant 800, Nampa
Final Permit Letter – Reopen for Cause

Dear Mr. Feil:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2016.0069 project 61883 to Heartland RV- Plant 800 located at Nampa for the travel trailer manufacturing. This PTC replaces PTC No. P-2016.0069 project 61821 issued on April 21, 2017. This reissued PTC includes a missed emissions limit for volatile organic compounds and the corresponding monitoring requirement. They are in permit conditions 2.3 and 2.15.

This permit is effective immediately and replaces the aforementioned PTC. This permit does not release Heartland RV- Plant 800 from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard Street, Boise, ID 83706, Fax (208) 373-0287.

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, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division
MS\sys Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Heartland RV – Plant 800
Permit Number P-2016.0069
Project ID 61883
Facility ID 027-00151
Facility Location 900 East Karcher Road
Nampa, Idaho 83687

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 May 23, 2017



Shawnee Chen, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) for correcting an error.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2016.0069 project 61821 issued on April 21, 2017.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Sources	Control Equipment
2	<p><u>Plant 800 - 1</u> Manufacturer: NA Model: NA Construction Date: 3/14/2016</p> <p>The operations in Plant 800-1 include assemble line operations, touchup paint operation, and final finish.</p> <p>In the assemble line operations, the activities that emit air pollutants are manual caulking, non-atomized spraying, aerosol spraying, and manual brush. The maximum production rate is two travel trailer units per hour.</p> <p>In the touch-up paint operation, the activity that emits air pollutants is using HVLP spray gun to paint. The maximum production rate of this operation is half travel trailer unit per hour.</p> <p>In final finish, the activity that emits air pollutants is hand/manually applying solvent/cleaner. The maximum production rate is two travel trailer units per hour.</p>	None
	<p><u>Plant 800 - 2</u> Manufacturer: NA Model: NA Construction Date: 1/3/2017 The operations are identical to Plant 800 - 1</p>	None
	<p><u>Plant 800 Lamination</u> Manufacturer: NA Model: NA Construction Date: 3/14/2016 Max. Production: 8 travel trailer units/hr</p> <p>The activity that emits air pollutants at plant 800 lamination operation is roll coating.</p>	None

Permit Section	Sources	Control Equipment
	<u>Plant 800 Cabinet Assembly</u> Manufacturer: NA Model: NA Construction Date: 3/14/2016 Max. Capacity: 8,000 CFM The activity that emits air pollutants at plant 800 cabinet assembly operation is miscellaneous wood cutting.	<u>Thor-Kleen Dust Collector</u> Manufacturer: NSGV Model: 32-75 Type: cyclone with filter bags PM ₁₀ control efficiency: 99.0%
	<u>Plant 800 Aluminum Welding</u> Manufacturer: NA Model: NA Manufacture Date: 3/14/2016 Max. Capacity: 3 lb electrode/hr for Plant 800-1 and Plant 800-2 respectively, or 6 lb electrode/hr total	None
	<u>Plant 800 Building Heating (10 space heaters and 2 radiant tube heaters)</u> Manufacturer: NA Model: NA Manufacture Date: NA Total Heat Input Rating: 8.4 MMBtu/hr Fuel: natural gas	None

2 Plant 800

2.1 Process Description

Heartland RV-Plant 800 is a travel trailer manufacturer. The operations at Heartland RV-Plant 800 consist of manual assembly, aluminum welding, lamination, wood cutting, touch-up and cleaning operations.

Heartland RV-Plant 800 will have two identical assembly lines. Each assembly line operates eight hours per day, five days per week, with a maximum capacity of two units per hour. Both lines use the same existing welding, lamination, and wood cutting operations.

Emissions will be generated from the manual application of caulks, sealers and adhesives, spot touch-up, and cleaning operations. Unit sidewalls will be constructed with welded aluminum frames laminated to fiber reinforced plastic composite panels. Minor wood cutting operations will also be conducted. Wood dust from the cutting operations will be controlled with an external return-air dust collection system. Natural gas combustion of building heaters also emits air pollutants.

2.2 Control Device Descriptions

Dust from the wood cutting operations will be controlled with an external return-air dust collection system.

Emission Limits

2.3 Emission Limit

The emissions of volatile organic compounds (VOC) from the plant shall not exceed 13.4 tons per year.

[5/23/2017]

2.4 Opacity Limit

Emissions from each stack, or any other stack, vent, or functionally equivalent opening associated with the facility 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

2.5 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution in accordance with IDAPA 58.01.01.776.

2.6 Fugitive Dust Control

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

2.7 Materials Used at Plant 800

The permittee shall use materials listed in Appendix A of the permit. However, the permittee may use alternative materials provided:

- that the use of alternative materials qualifies for an exemption from obtaining a PTC as specified at IDAPA 58.01.01.220-223, or
- that the use of the alternative materials 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 and 586.

2.8 Dust Collection System

Emissions from the wood cutting operations shall be controlled with a dust collection system with emissions concentration of 0.001 grain per actual cubic feet per minutes (gr/acfm) or less as used in the emissions calculation.

2.9 Filter System Procedures

Within 60 days of the permit issuance, the permittee shall have developed a Filter System Procedures document for the inspection and operation of the filter system which controls emissions from the wood cutting operations at the cabinet assembly operation. The Filter System Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Filter System Procedures document shall describe the procedures that will be followed to comply with the General Provisions and shall contain requirements for quarterly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at anytime. At a minimum the document shall include:

- procedures to determine if bags or cartridges are ruptured; and
- procedures to determine if bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of each filter system inspection in accordance with the General Provisions of this permit. The records shall include, but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g., exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Filter System Procedures document shall be submitted to DEQ within 60 days of permit issuance and shall contain a certification by a responsible official. Any changes to the Filter System Procedures document shall be submitted within 15 days of the change.

The Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring and recordkeeping requirements specified in the Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

Monitoring and Recordkeeping Requirements

2.10 Material Monitoring

For each material used that generates emissions, such as paint, solvent, and caulks, the permittee shall maintain purchase records and information provided by materials suppliers or manufacturers, such as Safety Data Sheet (formerly called Material Safety Data Sheet), or manufacturer's formulation data. The information shall include, but not be limited to:

- The manufacturer name and product number.
- The weight fractions of each toxic air pollutant (TAP), in percent by weight.
- The weight fractions of each hazardous air pollutant (HAP), in percent by weight.
- The weight fraction of volatile organic compound (VOC), in percent by weight.
- The density, in pounds per gallon.

2.11 Documentation for Alternative Materials

Prior to using alternative materials not specially listed in Appendix A of the permit, the permittee shall generate documentation that shows that the use of the alternative materials qualifies for an exemption in accordance with IDAPA 58.01.01.220, or the use of the alternative materials is limited to quantities that would result in toxic air pollutant emissions equal to or below the EL listed in IDAPA 58.01.01.585 and 586. The documentation shall be kept on site and made available to DEQ's representative upon request.

2.12 Documentation of Dust Collection System

The permittee shall keep the documentation to demonstrate that the dust collection system used for wood cutting operations has the emissions concentration of 0.001 gr/acfm or less.

2.13 Records for Odor Complaints

The permittee shall maintain records of all odor complaints received. If the complaint has merit, 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.

2.14 Records for Fugitive Dust

The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that 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.

2.15 Monitoring VOC

The permittee shall calculate VOC emissions quarterly and sum the VOC emissions over the previous four consecutive quarters to demonstrate compliance with the annual VOC emissions limit in Permit Condition 2.3.

[5/23/2017]

Reporting Requirements

2.16 Reporting Requirement

Each year the permittee shall submit a report by May 1st if alternative materials are used. The report shall include the documentation generated under Documentation for Alternative Materials permit condition and be submitted to:

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

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]

Appendix
Materials Taken from the Application

Chassis Preparation

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solids)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating
51333 Undercoat	7.09	65.75%	0.0%	65.8%	0.0%	56.20%	4.66	4.66

Assembly Line Operations

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solids)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating
Sikaflex 255	10.01	4.90%	0.0%	4.9%	0.0%	95.10%	0.49	0.49
Bondaflex 100	7.92	9.00%	0.0%	9.0%	0.0%	90.32%	0.71	0.71
Manus 25-AM	11.68	0.11%	0.0%	0.1%	0.0%	99.83%	0.01	0.01
Manus 75-AM	14.19	0.00%	0.0%	0.0%	0.0%	100.00%	0.00	0.00
Super Stick HAPS Free	6.08	70.30%	25.0%	45.3%	18.2%	41.93%	3.37	2.75
Cyclo C-33	5.42	92.00%	0.00%	92.00%	0.0%	0.09%	4.99	4.99
Oatey Clear Cement	7.51	88.00%	0.0%	88.0%	0.0%	12.00%	6.61	6.61

Touchup Paint Operation

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solids)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating
BASF AM800	6.90	79.71%	8.70%	71.01%	10.9%	9.00%	5.50	4.90
BASF NRL Bases	8.83	69.08%	0.00%	69.08%	0.0%	21.00%	6.10	6.10
BASF DC5135	8.50	68.20%	25.00%	43.20%	25.0%	31.80%	4.90	3.67
BASF 352-500	7.60	98.68%	0.00%	98.68%	0.0%	1.00%	7.50	7.50
BASF UR30	6.93	100.00%	10.00%	90.00%	10.0%	4.00%	6.93	6.24

Final Finish

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water & Exempt	Weight % Organics	Volume % Water & Exempt	Volume % Non-Volatiles (solids)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating
TCI DT-10 Lacquer Thinner	6.79	100.00%	0.00%	100.00%	0.0%	0.00%	N/A	6.79
TCI Acetone	6.69	100.00%	100.00%	0.00%	100.0%	0.00%	N/A	0.00
TCI Isopropanol	6.55	100.00%	0.00%	100.00%	0.0%	0.00%	6.55	6.55
TCI Mineral Spirits	6.48	100.00%	0.00%	100.00%	0.0%	0.00%	6.48	6.48
Markal Various Markers	11.18	0.00%	0.00%	0.00%	0.00%	100.00%	0.00	0.00

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating
798A	9.40	5.00%	0.0%	5.0%	0.0%	95.06%	0.47	0.47
2352*	8.14	0.00%	0.0%	0.0%	0.0%	100.00%	0.00	0.00

*2352 Cleaner is a heat dissolved solid