



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
Toni Hardesty, Director

June 2, 2005

**Certified Mail No. 7000 1670 0013 8129 0089**

Mr. Joel Kolker  
Plant Manager  
Kiefer Built, LLC  
305 East First Street  
Kanawha, IA 50447

RE: Facility ID No. 047-00018, Kiefer Built, LLC, Gooding  
Final Permit to Construct

Dear Mr. Kolker:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-040426 to Kiefer Built, LLC in accordance with IDAPA 58.01.01.200 through 228, (*Rules for the Control of Air Pollution in Idaho*). This PTC is effective immediately.

This permit does not release Kiefer Built, LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. Please refer to the appropriate permit number when submitting reports required in the Reporting Requirements section of the permit.

A representative of the Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. In addition to your facility's plant manager, DEQ recommends the following representatives attend the meeting: your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with the 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 Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

If you have any questions about the enclosed permit or the permitting process, please contact Bill Rogers at (208) 373-0502 or [wrogers@deq.idaho.gov](mailto:wrogers@deq.idaho.gov).

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/HE/sd

Permit No. P-040426



**Air Quality  
PERMIT TO CONSTRUCT**

State of Idaho  
Department of Environmental Quality

**PERMIT No.:** P-040426

**FACILITY ID No.:** 047-00018

**AQCR:** 063

**CLASS:** SM

**SIC:** 3715

**ZONE:** 11

**UTM COORDINATE (km):** 688.3, 4757.3

**1. PERMITTEE**  
Kiefer Built, LLC

**2. PROJECT**  
Initial Permit to Construct

**3. MAILING ADDRESS**  
1045 Agri-Lane

**CITY**  
Gooding

**STATE ID**

**ZIP**  
83330

**4. FACILITY CONTACT**  
Troy Preuit

**TITLE**  
Plant Manager

**TELEPHONE**  
(208) 934-5430

**5. RESPONSIBLE OFFICIAL**  
Joel Kolker

**TITLE**  
Plant Manager

**TELEPHONE**  
(641) 762-3201 extension 31

**6. EXACT PLANT LOCATION**  
1045 Agri-Lane, Gooding, Idaho

**COUNTY**  
Gooding

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Horse and livestock trailer assembly and painting 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 is not transferable to another person, place, or piece or set of 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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**TONI HARDESTY, DIRECTOR**  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:** June 2, 2005

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## **Acronyms, Units, and Chemical Nomenclature**

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
DEQ	Idaho Department of Environmental Quality
°F	degrees Fahrenheit
ft	foot
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
O&M	operations and maintenance
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SM	synthetic minor
VOC	Volatile Organic Compounds
T/yr	tons per year
UTM	Universal Transverse Mercator

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040426**

<b>Permittee:</b>	Kiefer Built, LLC	<b>Facility ID No.</b> 047-00018	<b>Date Issued:</b>	June 2, 2005
<b>Location:</b>	Gooding, Idaho			

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

- 1.1 The purpose of this permit to construct is to satisfy the requirements of IDAPA 58.01.01.200 et seq., *Rules for the Control of Air Pollution in Idaho*, for issuing Permits to Construct (PTC).
- 1.2 This permit is the facility's initial PTC.

***Regulated Sources***

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

**Table 1.1 REGULATED EMISSIONS SOURCES**

<b>Permit Sections</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	<p><u>Paint Booths 1 and 2</u>                      Paint Booths 1 and 2 will be used to prime and paint horse and livestock trailer components and the trailers themselves.</p> <p>Air pollutant emissions from the paint booths are exhausted through two identical stacks with the following parameters:</p> <p>Height (ft) = 33                      Stack exit flow rate (acfm) = 24,000                      Stack diameter (ft) = 3.5                      Stack exit temperature (°F) = 140</p>	<p><u>Fiberglass Filter System</u>                      Particulate matter emissions from the paint booths are controlled by fiberglass filters with the following specifications:</p> <p>Manufacturer: AFC or alternative manufacturer                      Efficiency: 97%</p>

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**2. PAINT BOOTHS 1 AND 2, AND PAINT KITCHEN**

**2.1 Process Description**

Paint Booths 1 and 2 will be used to spray primer or paint onto steel trailer components and trailers. After the components and trailers are assembled, they are then washed with a mild phosphoric acid solution, rinsed with water, air dried, and prepared for primer or paint application. Each booth is equipped with two paint spray guns, each rated at 6.6 gallons per hour (gal/hr). Each booth is equipped with its own air pollution emissions stack (referred to as Paint Booth stacks 1 and 2). Either booth can be used for priming or painting.

Before spraying, primer and paint are mixed in the paint kitchen. The paint kitchen is a small, stand-alone structure in which primer and paint are mechanically mixed. Primer and paint are pneumatically delivered from the paint kitchen to the paint spray guns. A passive vent releases pressure and a small amount of PM<sub>10</sub> and VOC emissions from the paint kitchen. The PM<sub>10</sub> and VOC emissions from the paint kitchen are included with the PM<sub>10</sub> and VOC emissions from the paint booths as allowable emissions from this facility (refer to Table 2.1).

**2.2 Emissions Control Description**

Particulate matter (PM) emissions from Paint Booths 1 and 2 are controlled by fiberglass filter systems. The PM control efficiency of the filters is 97%. The VOC emissions from the paint booths are uncontrolled. PM and VOC emissions from the paint kitchen are uncontrolled.

***Emissions Limits***

**2.3 Visible Emissions Limit**

The permittee shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

**2.4 PM<sub>10</sub> and VOC Emissions Limits**

The PM<sub>10</sub> and VOC emissions from Paint Booth stacks 1 and 2 and the paint kitchen vent shall not exceed any corresponding emissions rate limits listed in Table 2.1.

**Table 2.1 EMISSIONS LIMITS FROM PAINT BOOTH STACKS 1 and 2 AND THE PAINT KITCHEN VENT**

Source Description	PM <sub>10</sub>		VOC
	lb/day	T/yr*	T/yr*
Paint Booth stacks 1 and 2, and the paint kitchen vent	43.68	5.68	57.22

\* T/yr is tons of emissions per any consecutive 12-month period

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**Operating Requirements**

**2.5 Throughput Limits**

- The maximum amount of primer and paint sprayed in Paint Booths 1 and 2 shall not exceed 105 gallons per day.
- The maximum amount of primer and paint sprayed in Paint Booths 1 and 2 shall not exceed 27,393 gallons per any consecutive 12-month period.
- The maximum amount of DuPont 193S sprayed in Paint Booths 1 and 2 shall not exceed 461 gallons per any consecutive 12-month period.

**2.6 Filter System Monitoring Equipment**

The permittee shall, install, calibrate, maintain, and operate in accordance with manufacturer specifications, equipment to continuously measure the pressure differential across the fiberglass filter systems used in Paint Booths 1 and 2.

**2.7 Operations and Maintenance Manual**

Within 60 days of permit issuance, the permittee shall have developed an operations and maintenance (O&M) manual for the fiberglass filter systems used in Paint Booths 1 and 2. The manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the filters. The manual shall contain, at a minimum, the pressure drop operating range for the fiberglass filters system and scheduled maintenance requirements. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request. Within 30 days of O&M manual development, the permittee shall submit a copy of the manual to DEQ at the following address:

Air Quality Compliance  
Department of Environmental Quality  
601 Pole Line Rd., Suite 2  
Twin Falls, ID 83301

**2.8 Pressure Drop Across the Fiberglass Filter System**

The pressure drop across the fiberglass filter systems shall be maintained within manufacturer and O&M manual specifications. Documentation of both the manufacturer and O&M manual operating pressure drop specifications shall remain on site at all times and shall be made available to DEQ representatives upon request.

**2.9 Fiberglass Filter System Operations**

The fiberglass filter systems shall be operated whenever the Paint Booths 1 and 2 are operated.

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<b>Location:</b> Gooding, Idaho		

**2.10 Reasonable Control of Fugitive Emissions**

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

***Monitoring and Recordkeeping Requirements***

**2.11 Throughput Monitoring**

The permittee shall monitor and record the paint, primer, and DuPont 193S throughputs daily, monthly, and annually to demonstrate compliance with Permit Condition 2.5. Annual throughput shall be determined by summing daily throughputs monthly, and monthly throughputs over the previous consecutive 12-month period. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

**2.12 Pressure Drop Monitoring**

The permittee shall monitor and record the pressure drop across the fiberglass filter systems once per day when in operation to demonstrate compliance with Permit Condition 2.8. Records of this information shall remain on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

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<b>Permittee:</b>	Kiefer Built, LLC	<b>Facility ID No. 047-00018</b>	<b>Date Issued:</b>	May 18, 2005
<b>Location:</b>	Gooding, Idaho			

**3. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

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.
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.
3. The permittee shall allow the director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
  - Initiation of Construction - Date
  - Completion/Cessation of Construction - Date
  - Actual Production Startup - Date
  - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
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

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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.

7. 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.
8. In accordance with IDAPA 58.01.01.123, 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.