



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor
C. Stephen Allred, Director

November 30, 2001

CERTIFIED MAIL # 7099 3220 0006 2681 6548

Mr. Doug Swingley, Plant Engineer
Spears Manufacturing Co.
15853 Olden Street
Sylmar, CA 91342

RE: P-000412, Spears Manufacturing Co., Jerome, Idaho
(Final Permit to Construct No. 053-00002)

Dear Mr. Swingley:

The Idaho Department of Environmental Quality (Department) is issuing modified Permit to Construct (PTC) Number 053-00002 for Spears Manufacturing Co. in accordance with IDAPA 58.01.01.200 through 223 (*Rules for the Control of Air Pollution in Idaho*). This PTC is effective immediately and is based on your permit application received May 14, 2001. This permit does not release Spears Manufacturing Co. from compliance with all other applicable federal, state, local, or tribal laws, regulations, or ordinances.

You are encouraged to attend a meeting with the Department to discuss the permit terms and requirements with which your facility must comply. Stephen VanZandt of the Twin Falls Regional Office will contact you regarding this meeting. The Department recommends that your facility's plant manager, your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions attend the meeting.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, the Department encourages you to contact us to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please call Dan Salgado at (208) 373-0502.

Sincerely,

Katherine B. Kelly
Administrator
Air Quality Division

KK/CJZ/tk AIR.S5BG.SRCE.0402.460

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Enclosures

cc: Belinda McFarland, Technical Services
Steve VanZandt, Twin Falls Regional Office
Laurie Kral, EPA - Region 10



**Air Quality
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: 053-00002

AQCR: 63

CLASS: SM

SIC: 3089

ZONE: 11

UTM COORDINATE (km): 703.4, 4730.4

1. PERMITTEE

Spears Manufacturing Company

2. PROJECT

Plantwide

3. MAILING ADDRESS

2572 S. Lincoln St.

CITY

Jerome

STATE

Idaho

ZIP

83338

4. FACILITY CONTACT

Doug Swingley

TITLE

Plant Engineer

TELEPHONE

(818) 364-6766

5. RESPONSIBLE OFFICIAL

Doug Swingley

TITLE

Plant Engineer

TELEPHONE

(818) 364-6766

6. EXACT PLANT LOCATION

0.9 miles south of Jerome, east side of road.

COUNTY

Jerome

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Polyvinyl Chloride (PVC) Molding and Fabrication

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 that are regulated by the state of Idaho and to the sources specifically allowed to be constructed 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; and (d) in no manner implies or suggests that the Idaho Department of Environmental Quality (Department) or its officers, agents, or employees, assumes 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 Department approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: November 30, 2001

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 053-00002

Permittee: Spears Manufacturing Company
Location: Jerome, Idaho

Date Issued: November 30, 2001

SOURCE: GLUE ROOM

1. **EMISSION LIMITS**

1.1 Emission Limits

Volatile organic compound (VOC), tetrahydrofuran (THF), methyl ethyl ketone (MEK), and cyclohexanone emissions from the glue room stacks (Stacks 1, 2, 4, 5, and 6) combined shall not exceed any corresponding emission rate limits listed in the appendix of this permit.

1.2 Opacity Limit

Emissions from the glue room stacks (Stacks 1, 2, 4, 5, and 6), or any other stack, vent, or functionally equivalent opening associated with the glue room operation, 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. **OPERATING REQUIREMENTS**

2.1 VOC and Toxic Air Pollutants

Compliance with the emission limits for VOC, THF, MEK, and cyclohexanone shall be determined by multiplying the amount of each type of product used by its maximum weight percentage of VOC, THF, MEK, and cyclohexanone respectively as listed in the most recent material safety data sheet (MSDS) or the manufacturer's specifications. The emission limits apply to the total emissions of each component (VOC, THF, MEK, and cyclohexanone) from all types of cement and primer used.

3. **MONITORING AND RECORDKEEPING REQUIREMENTS**

3.1 Throughput Monitoring

Each day when operating, the permittee shall monitor and record the throughput of each type of product used for that day and for the most recent 12-month period. A compilation of the most recent two years of data shall be kept onsite and shall be made available to Department representatives upon request. The type, amount, and maximum weight percentage of VOCs, THF, MEK, and cyclohexanone shall be recorded.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 053-00002

Permittee: Spears Manufacturing Company
Location: Jerome, Idaho

Date Issued: November 30, 2001

SOURCE: FIBERGLASS CUTTING

4. EMISSION LIMITS

4.1 Emission Limits

Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM_{10}) emissions from the fiberglass cutting stack (Stack 8) shall not exceed any corresponding emission rate limits listed in the appendix of this permit.

4.2 Opacity Limit

Emissions from the fiberglass cutting stack (Stack 8), or any other stack, vent, or functionally equivalent opening associated with the fiberglass cutting operation, 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.

5. OPERATING REQUIREMENTS

5.1 Throughput Limits

The maximum daily throughput of fiberglass in the fiberglass cutting operation shall not exceed 752 pounds per day. The maximum annual throughput of fiberglass in the fiberglass cutting operation shall not exceed 94 tons per any consecutive 12-month period.

5.2 Fiberbond Filter

The Fiberbond filter, or equivalent, shall be maintained within the manufacturer's specifications. The filter shall be properly installed in the grinding room air exhaust system when the grinding room is in operation. The filter used must have a PM_{10} efficiency rating of at least 91.4 percent.

6. MONITORING AND RECORDKEEPING REQUIREMENTS

6.1 Throughput Monitoring

Each day when operating, the permittee shall monitor and record the throughput of fiberglass, in pounds, for that day and for the most recent 12-month period. A compilation of the most recent two years of data shall be kept onsite and shall be made available to Department representatives upon request.

6.2 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an Operations and Maintenance (O&M) Manual for the Fiberbond filter which describes the procedures that will be followed to comply with General Provision B and the air pollution control device manufacturer specifications. This manual shall remain onsite at all times and shall be made available to Department representatives upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 053-00002

Permittee: Spears Manufacturing Company
Location: Jerome, Idaho

Date Issued: November 30, 2001

SOURCE: BOND COAT/WEST OUT/ROLL OUT

7. EMISSION LIMITS

7.1 Emission Limits

Acetone and styrene emissions from the bond coat/wet out/roll out stacks (Stacks 10, 11, and 12) combined shall not exceed any corresponding emission rate limits listed in the appendix of this permit.

7.2 Opacity Limit

Emissions from the bond coat/wet out/roll out stacks (Stacks 10, 11, and 12), or any other stack, vent, or functionally equivalent opening associated with the bond coat/wet out/roll out operation, 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.

8. OPERATING REQUIREMENTS

8.1 Throughput Limits

The maximum daily throughput of acetone shall not exceed 114 pounds per day. The maximum annual throughput of acetone shall not exceed 14 tons per any consecutive 12-month period.

The maximum daily throughput of polyester resin shall not exceed 333 pounds per day. The maximum annual throughput of polyester resin shall not exceed 41.6 tons per any consecutive 12-month period.

8.2 Styrene Weight Percent

The styrene weight percent of the polyester resin shall not exceed 47%. The percent styrene by weight can be obtained from the most recent MSDS or the manufacturer's specifications.

9. MONITORING AND RECORDKEEPING REQUIREMENTS

9.1 Throughput Monitoring

Each day when operating, the permittee shall monitor and record the throughput of acetone and polyester resin for that day and for the most recent 12-month period. A compilation of the most recent two years of data shall be kept onsite and shall be made available to Department representatives upon request.

9.2 The permittee shall have available an MSDS for each resin used. The MSDS shall remain onsite at all times and shall be made available to Department representatives upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 053-00002

Permittee: Spears Manufacturing Company
Location: Jerome, Idaho

Date Issued: November 30, 2001

SOURCE: GRINDING ROOM

10. EMISSION LIMITS

10.1 Emission Limits

Particulate matter and PM₁₀ emissions from the grinding room stack (Stack 13) shall not exceed any corresponding emission rate limits listed in the appendix of this permit.

10.2 Opacity Limit

Emissions from the grinding room stack (Stack 13), or any other stack, vent, or functionally equivalent opening associated with the grinding room, 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.

11. OPERATING REQUIREMENTS

11.1 Throughput Limits

The maximum daily throughput of glass and resin (which coat PVC parts) processed in the grinding room shall not exceed 1,209 pounds per day. The maximum annual throughput of the grinding room shall not exceed 151 tons of glass and resin coating per any consecutive 12-month period.

11.2 Fiberbond Filter

The Fiberbond filter, or equivalent, shall be maintained within the manufacturer's specifications. The filter shall be properly installed in the grinding room air exhaust system when the grinding room is in operation. The filter used must have a PM₁₀ efficiency rating of at least 91.4%.

12. MONITORING AND RECORDKEEPING REQUIREMENTS

12.1 Throughput Monitoring

Each day when operating, the permittee shall monitor and record the throughput of glass and resin coating material processed in the grinding room for that day and for the most recent 12-month period. A compilation of the most recent two years of data shall be kept onsite and shall be made available to Department representatives upon request.

12.2 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed an O&M Manual for the Fiberbond filter which describes the procedures that will be followed to comply with General Provision B and the air pollution control device manufacturer specifications. This manual shall remain onsite at all times and shall be made available to Department representatives upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 053-00002

Permittee: Spears Manufacturing Company
Location: Jerome, Idaho

Date Issued: November 30, 2001

SOURCE: PAINT ROOM

13. EMISSION LIMITS

13.1 Emission Limits

Volatile organic compound emissions from the paint room stack (Stack 14) shall not exceed any corresponding emission rate limits listed in the appendix of this permit.

13.2 Opacity Limit

Emissions from the paint room stack (Stack 14), or any other stack, vent, or functionally equivalent opening associated with the paint room, 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.

14. OPERATING REQUIREMENTS

14.1 Compliance Determination

Compliance with the emission limits for VOCs shall be determined by multiplying the amount of each type of paint or coating used by its maximum weight percentage of VOC. The maximum weight percentage of VOC may be obtained from the most recent MSDS or current manufacturer's specifications.

15. MONITORING AND RECORDKEEPING REQUIREMENTS

15.1 Throughput Monitoring

Each day when operating, the permittee shall monitor and record the throughput, in pounds, and the types of paints and coatings for that day and for the most recent 12-month period. A compilation of the most recent two years of data shall be kept onsite and shall be made available to Department representatives upon request.

The type, amount, and maximum weight percentage of VOCs of each type of paint or coating shall be recorded.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 053-00002

Permittee: Spears Manufacturing Company
Location: Jerome, Idaho

Date Issued: November 30, 2001

FACILITY-WIDE CONDITIONS

16. OPERATING REQUIREMENTS

16.1 Reasonable Control of Fugitive Emissions

As required in IDAPA 58.01.01.651, all reasonable precautions shall be taken to prevent PM from becoming airborne. 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 which might affect the movement of PM. Some of the reasonable precautions include, where practical, but are not limited to:

- 16.1.1 Use of water or chemicals for control of dust when demolishing existing buildings or structures, performing construction operations, grading roads, and clearing lands;
- 16.1.2 Applying asphalt, oil, water or suitable chemicals to, or covering, dirt roads, material stockpiles, and other surfaces that can create dust;
- 16.1.3 Installation and use 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;
- 16.1.4 Covering of open-bodied trucks transporting materials likely to give rise to airborne dusts;
- 16.1.5 Paving roadways and maintaining them in a clean condition; or
- 16.1.6 Promptly removing earth or other stored material from streets.

17. MONITORING AND RECORDKEEPING REQUIREMENTS

- 17.1 The facility shall maintain a daily record of any of the reasonable control measures implemented. On days when no reasonable control measures are implemented, no record need be made.

18. REPORTING REQUIREMENTS

18.1 Certification of Documents

All documents submitted to the Department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, 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.

19. RULES FOR CONTROL OF OPEN BURNING

The permittee shall comply with the provisions of IDAPA 16.01.01.600-616 to protect public health and welfare from air pollutants resulting from open burning.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 053-00002

Permittee: Spears Manufacturing Company
Location: Jerome, Idaho

Date Issued: November 30, 2001

APPENDIX

APPENDIX

SPEARS MANUFACTURING

Emission Limits^a - Daily Pounds per Day (lb/d) and Annual^b Tons per Year (T/yr)

SOURCE DESCRIPTION	PM ^c		PM ₁₀ ^d		VOC ^e		THF ^f		MEK ^g		Cyclohexanone		Acetone		Styrene	
	(lb/d)	T/yr	(lb/d)	T/yr	lb/d	T/yr	lb/d	T/yr	lb/d	T/yr	Lb/d	T/yr	lb/d	T/yr	lb/d	T/yr
Glue Room (Cement and Primer) (Stacks 1, 2, 4, 5, & 6 Combined)					653	82	653	82	72	9.0	58	7.2				
Fiberglass Cutting	0.74	0.093	0.74	0.093												
Bond Coat/ Wet Out/ Roll Out													114	14.3	49.9	6.24
Grinding Room	3.12	0.39	3.12	0.39												
Paint Room					16	2.0										

- a. As determined by a pollutant-specific U.S. Environmental Protection Agency reference method, or a Department-approved alternative, or as determined by the Department's emission estimation methods used in this permit analysis.
- b. As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.
- c. PM = Particulate Matter
- d. PM₁₀ = Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
- e. VOC = Volatile Organic Compound
- f. THF = Tetrahydrofuran
- g. MEK = Methyl Ethyl Ketone

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 053-00002

Permittee: Spears Manufacturing Company
Location: Jerome, Idaho

Date Issued: November 30, 2001

GENERAL PROVISIONS

PERMIT TO CONSTRUCT GENERAL PROVISIONS

- A. 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 emission 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.
- B. 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.
- C. The permittee shall allow the Director, and/or their authorized representative(s), upon the presentation of credentials:
1. To enter at reasonable times upon the premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 2. 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 emission testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
- D. 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.
- E. The permittee shall notify the Department, in writing, of the required information for the following events within five working days after occurrence:
1. Initiation of Construction - Date
 2. Completion/Cessation of Construction - Date
 3. Actual Production Startup - Date
 4. Initial Achievement of Maximum Production Rate - Production Rate and Date
- F. If emission testing is specified, the permittee must schedule such testing within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup. Such testing must **strictly** adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written Department approval. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.
- The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by the Department, unless (1) the test demonstrates noncompliance, (2) a more restrictive operating limit is specified elsewhere in this permit, or (3) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.
- G. 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.