



State of Utah

Department of
Environmental Quality

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Site ID: 10156

Title V Operating Permit

PERMIT NUMBER: 1100070002

DATE OF PERMIT: August 10, 2001

Date of Last Revision: TBD

This Operating Permit is issued to, and applies to the following:

Name of Permittee:

Utility Trailer Manufacturing Company
1111 South 1000 West
Clearfield, UT 84016-0387

Permitted Location:

Trailer Manufacturing Facility
1111 South 1000 West.
Clearfield, UT 84016

UTM coordinates: 4,511,236 meters Northing, 421,977 meters Easting
SIC code: 3715

ABSTRACT

Utility Trailer Manufacturing (UTM) operates a refrigerated truck trailer manufacturing operation in two buildings, E-14 and N-14, of the Freeport Center and an additional building located approximately one mile West at 1111 South 1000 West in Clearfield, Davis County, UT. All three facilities are considered a single major source of air pollution. Steel is cut and welded together to fabricate the structural frames for the trailers. Some of the subassemblies for trailer frames are dipped into tanks containing corrosion inhibitors while other subassemblies are painted in large paint spray booths. Trailer shells constructed from aluminum, stainless steel, wood and/or fiberglass are mounted onto the trailer frames. A foaming insulator mixture blended with an expansion agent is injected into the walls, floors, and ceiling of the trailers. Once the foam insulation cures, the trailers are moved to the final assembly area to install wheels, electrical wiring, lights and miscellaneous features (such as refrigeration units). Utility Trailer is a major source for emission of Volatile Organic Compounds (VOC).

UTAH AIR QUALITY BOARD

By:

M. Cheryl Heying, Executive Secretary

Prepared By:

Ron Reece

Operating Permit History

8/10/01 - Permit issued	Action initiated by an initial operating permit application	
3/29/02 -Permit modified	Action initiated by an administrative amendment (initiated by source)	Amend language to clarify monitoring requirements in Conditions II.B.3.a.1, II.B.5.b.1, and II.B.6.b.1.
12/8/03 -Permit modified	Action initiated by an administrative amendment (initiated by DAQ)	To correct paint booth location and change condition origins to correct Approval Order.
xx/xx/2008-Permit issued	Action initiated by a renewal of an operating permit	To incorporate the changes approved in DAQE-AN0156012-06, dated March 6, 2006, to add a new bead blasting operation. CAM is not applicable to this renewal.

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Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

Section I: General Provisions

I.A. Federal Enforcement.

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

I.B. Permitted Activity(ies).

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

I.C. Duty to Comply.

- I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))
- I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))
- I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))
- I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

I.D. **Permit Expiration and Renewal.**

I.D.1 **This permit is issued for a fixed term of five years and expires on August 10, 2011.** (R307-415-6a(2))

I.D.2 Application for renewal of this permit is due by **February 10, 2011.** An application may be submitted early for any reason. (R307-415-5a(1)(c))

I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

I.E. **Application Shield.**

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

I.F. **Severability.**

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

I.G. **Permit Fee.**

I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

I.H. **No Property Rights.**

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

I.I. **Revision Exception.**

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

I.J. **Inspection and Entry.**

I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))

I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))

I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))

I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))

I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

I.K. **Certification.**

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

I.L. **Compliance Certification.**

I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than **September 9, 2008** and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))

I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;

I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

- I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.
- I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Office of Enforcement, Compliance and Environmental Justice
(mail code 8ENF)
EPA, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

I.M. **Permit Shield.**

- I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:
- I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))
- I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))
- I.M.2 Nothing in this permit shall alter or affect any of the following:
- I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))
- I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))
- I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))
- I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

I.N. **Emergency Provision.**

- I.N.1 An “emergency” is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))
- I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))
- I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))
- I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))
- I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))
- I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))
- I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))

I.O. **Operational Flexibility.**

Operational flexibility is governed by R307-415-7d(1).

I.P. **Off-permit Changes.**

Off-permit changes are governed by R307-415-7d(2).

I.Q. **Administrative Permit Amendments.**

Administrative permit amendments are governed by R307-415-7e.

I.R. **Permit Modifications.**

Permit modifications are governed by R307-415-7f.

I.S. **Records and Reporting.**

I.S.1 Records.

- I.S.1.a The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))
- I.S.1.b For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))
- I.S.1.b.1 The date, place as defined in this permit, and time of sampling or measurement.
- I.S.1.b.2 The date analyses were performed.
- I.S.1.b.3 The company or entity that performed the analyses.
- I.S.1.b.4 The analytical techniques or methods used.
- I.S.1.b.5 The results of such analyses.
- I.S.1.b.6 The operating conditions as existing at the time of sampling or measurement.
- I.S.1.c Additional record keeping requirements, if any, are described in Section II, Special Provisions.
- I.S.2 Reports.
- I.S.2.a Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))
- I.S.2.b All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))
- I.S.2.c The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. **Prompt, as used in this condition, shall be defined as written notification within 14 days.** Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))
- I.S.3 Notification Addresses.
- I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:

Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820
Phone: 801-536-4000

I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:

For annual compliance certifications

Environmental Protection Agency, Region VIII
Office of Enforcement, Compliance and
Environmental Justice (mail code 8ENF)
1595 Wynkoop Street
Denver, CO 80202-1129

For reports, notifications, or other correspondence
related to permit modifications, applications, etc.

Environmental Protection Agency, Region VIII
Office of Partnerships & Regulatory Assistance
Air & Radiation Program (mail code 8P-AR)
1595 Wynkoop Street
Denver, CO 80202-1129
Phone: 303-312-6440

I.T. Reopening for Cause.

I.T.1 A permit shall be reopened and revised under any of the following circumstances:

I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))

I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))

I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))

I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))

I.T.2 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

I.U. Inventory Requirements.

An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

Section II: SPECIAL PROVISIONS

II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.

(R307-415-4(3)(a) and R307-415-4(4))

II.A.1 Surface Coating Operations (designated as 01)

Unit Description: Surface coating operations conducted at nine spray paint booths, two dip coating tanks and various touch up areas. Application techniques include high volume low pressure spray, air assisted spray, airless spray, and dip coating.

II.A.2 Paint Booths (designated as 02)

Unit Description: Nine paint booths: three downdraft spray paint booths and a small parts paint booth located in Bldg E-14; one downdraft spray paint booth in Bldg N-14; three spray paint booths and a small parts paint booth located at the 1111 South 1000 West location.

II.A.3 Dip Coating Tanks (designated as 03)

Unit Description: One unheated dip coating tank equipped with cover and vent hood located in Bldg E-14 and one natural gas heated, non-VOC dip coating tank equipped with cover located at the 1111 South 1000 West location.

II.A.4 Enclosed Spray Gun Cleaners (designated as 04)

Unit Description: Several enclosed spray gun cleaners located at Bldg E-14 and the 1111 South 1000 West location.

II.A.5 Foam Application Stations (designated as 05)

Unit Description: Various diphenylmethane diisocyanate foam application stations located in Buildings E-14 and N-14 as well as at the 1111 South 1000 West location. No unit-specific applicable requirements.

II.A.6 Abrasive Blast Booths (designated as 06)

Unit Description: Two abrasive blast booths equipped with a dust collector; located at the 1111 South 1000 West location.

II.A.7 Externally Vented Dust Collection Systems (designated as 07)

Unit Description: A wood sawdust collection system and a welding fume collection system both located at the 1111 South 1000 West location.

II.A.8 Internally Vented Fume Collectors (designated as 08)

Unit Description: Various fume collectors for welding fumes located at Building E-14 and at the 1111 South 1000 West location. No unit-specific applicable requirements.

II.A.9 Emergency Power Generator (designated as 09)

Unit Description: A 125 KW diesel-fired power generator located at the 1111 South 1000 West location.

II.B. Requirements and limitations.

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated: (R307-415-6a(1))

II.B.1 Conditions on permitted source (Source-wide)

II.B.1.a Condition:

VOC emissions shall be no greater than 198 tons per 12-month rolling period. [Authority granted under R307-401-8(1)(a) [BACT]; condition originated in DAQE-AN0156012-06]

II.B.1.a.1

Monitoring:

VOC emissions shall be determined on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 15 days after the end of each calendar month.

II.B.1.a.2

Recordkeeping:

VOC emissions shall be determined by maintaining a record of VOC emitting materials used each month. The records shall include the following data for each material used:

1. Name of the VOC emitting material, such as; paint, solvent, reducers, additives, etc.
2. Density of each material (pounds per gallon), as applied.
3. Percent by weight of VOC in each material
4. Gallons of each VOC emitting material consumed each month.
5. The amount of VOC emitted monthly by each material used, calculated by the following procedure:

$$\text{VOC} = (\% \text{ VOC by Weight}/100) \times (\text{Density lb/gal}) \times (\text{gal Consumed}) \times (1 \text{ ton}/2,000 \text{ lb})$$

6. The total amount of VOC emitted monthly from all materials used.
7. The amount of VOCs reclaimed may be similarly quantified and subtracted from the quantities calculated above, to provide the 12- month rolling total VOC emissions.

Daily records of consumption shall be recorded for all periods when plant is operating.

II.B.1.a.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.b

Condition:

Combined hazardous air pollutant (HAP) emissions shall be no greater than 24.5 tons per 12-month rolling period. [Authority granted under R307-401-8(1)(a) [BACT]; condition originated in DAQE-AN0156012-06]

II.B.1.b.1

Monitoring:

HAP emissions shall be determined on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 15 days after the end of each calendar month.

II.B.1.b.2

Recordkeeping:

HAP emissions shall be determined by maintaining a record of HAP emitting materials consumed each month. The records shall include the following data for each material:

1. Name of the HAP emitting material, such as; paint, solvent, reducers, additives, etc.
2. Density of each material (pounds per gallon), as applied.
3. Percent by weight of HAP in each material.
4. Gallons of each HAP emitting material consumed each month.
5. The amount of total HAP emitted monthly from each material consumed, calculated by the following procedure:

$$\text{HAP} = (\% \text{ HAP by Weight}/100) \times (\text{Density lb/gal}) \times (\text{gal consumed}) \times (1 \text{ ton}/2,000 \text{ lb})$$

6. The total amount of HAP emitted monthly from all materials consumed.
7. The amount of HAP's reclaimed may be similarly quantified and subtracted from the quantities calculated above, to provide the 12-month rolling HAP emissions.

Daily records of consumption shall be recorded for all periods when plant is operating.

II.B.1.b.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.c

Condition:

Emissions of any single HAP shall be no greater than 9.5 tons per 12-month rolling period. [Authority granted under R307-401-8(1)(a) [BACT]; condition originated in DAQE-AN0156012-06]

II.B.1.c.1

Monitoring:

Compliance with a combined HAP emission level of 7.1 tons per year (75 percent of the individual HAP limit) shall demonstrate compliance with the individual HAP limit of 9.5 tons per year. If the combined HAP emissions are greater than 7.1 tons per year, the permittee shall calculate a 12-month rolling total for each individual HAP for every month thereafter until the combined HAP emissions are below 7.1 tons per year for three consecutive months. Monthly calculations shall be made no later than 15 days after the end of each calendar month.

II.B.1.c.2

Recordkeeping:

HAP emissions shall be determined by maintaining a record of HAP emitting materials consumed each month. The records shall include the following data for each material:

1. Name of the HAP emitting material, such as; paint, solvent, reducers, additives, etc.
2. Density of each material (pounds per gallon), as applied.
3. Percent by weight of HAP in each material.
4. Gallons of each HAP emitting material consumed each month.
5. The amount of total HAP emitted monthly from each material consumed, calculated by the following procedure:

$$\text{HAP} = (\% \text{ HAP by Weight}/100) \times (\text{Density lb/gal}) \times (\text{gal consumed}) \times (1 \text{ ton}/2,000 \text{ lb})$$

6. The total amount of HAP emitted monthly from all materials consumed.
7. The amount of HAP's reclaimed may be similarly quantified and subtracted from the quantities calculated above, to provide the 12-month rolling HAP emissions.

Daily records of consumption shall be recorded for all periods when plant is operating.

II.B.1.c.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.d

Condition:

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any permitted plant equipment, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [Authority granted under R307-401-5; condition originated in DAQE-AN0156012-06]

II.B.1.d.1

Monitoring:

Records required for this permit condition will serve as monitoring.

II.B.1.d.2

Recordkeeping:

Records documenting scheduled and unscheduled maintenance shall be maintained. A copy of all manufacturers' instructions, established operating

instructions, or established maintenance practices for pollution control equipment and pollution emitting equipment shall be made available upon request.

II.B.1.d.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.e

Condition:

Visible emissions shall be no greater than 10 percent opacity from any stationary point or fugitive emission source associated with a permitted emission unit. [Authority granted under R307-401-8(1)(a) [BACT]; condition originated in DAQE-AN0156012-06]

II.B.1.e.1

Monitoring:

A visual opacity survey of each affected emission unit shall be performed on a weekly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. If visible emissions other than condensed water vapor are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9 for point sources, and in accordance 58 FR 61640 Method 203A for fugitive sources.

II.B.1.e.2

Recordkeeping:

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit.

If an opacity determination is indicated, all data required by 40 CFR 60, Appendix A, Method 9 and/or 58 FR 61640 Method 203A shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.e.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2

Conditions on Surface Coating Operations (01)

II.B.2.a

Condition:

The permittee shall implement the following control techniques and work practices at all times to reduce VOC emissions from fugitive type sources:

- (a) tight fitting covers for open tanks;
- (b) covered containers for solvent wiping cloths;
- (c) collection hoods for areas where solvent is used for cleanup; and
- (d) proper disposal of dirty cleanup solvent.

Waste materials which contain solvents shall be disposed of by recycling, reclaiming or by incineration in an incinerator approved to process hazardous materials, or by an alternate means approved by the Executive Secretary.

The permittee shall install, operate, and maintain process or control equipment, or both, monitoring instruments or procedures, as necessary, to minimize fugitive VOC

emissions. [Authority granted under R307-340-4; condition originated in DAQE-AN0156012-06]

II.B.2.a.1

Monitoring:

An inspection shall be made daily for proper control techniques and work practices to insure: minimization of fugitive VOC emissions, equipment is in good operating condition, proper disposal of waste solvents, and posting of operation and maintenance procedures near solvent cleaning equipment.

II.B.2.a.2

Recordkeeping:

The permittee shall record the date, time, locations and results of each inspection required under this provision. The records shall be maintained in accordance with provisions of Section I.S.1 of this permit.

II.B.2.a.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.b

Condition:

For all applications of surface coatings to miscellaneous metal parts not subject to 40 CFR 63, Subpart GG, the permittee may not cause, allow or permit discharge to the atmosphere of any volatile organic compounds in excess of:

(a) 4.3 pounds per gallon of coating, excluding water and solvents exempt from the definition of volatile organic compound, delivered to a coating applicator that applies clear coating;

(b) 3.5 pounds per gallon of coating, excluding water and solvents exempt from the definition of volatile organic compound, delivered to a coating applicator in a coating application system that utilizes air or forced warm air at temperatures up to 194 degrees F;

(c) 3.5 pounds per gallon of coating, excluding water and solvents exempt from the definition of volatile organic compound, delivered to a coating applicator that applies extreme performance coatings;

(d) 3.0 pounds per gallon of coating, excluding water and solvents exempt from the definition of volatile organic compound, delivered to a coating applicator for all other coating and coating application systems.

If low VOC content coatings are used to comply with the VOC emission limitations discussed above, the permittee shall express emissions in terms of pounds of VOC per gallon of coating less water or exempt solvent. If add-on controls or transfer efficiency improvements are used to comply with the VOC emission limitations discussed above, the permittee shall perform the equivalency calculations described in EPA 340/1-86-016 Guideline for Surface Coating Calculations to demonstrate compliance with VOC emissions in units of lbs. VOC/gallon of solid rather than in units of lbs. VOC/gallon of coating. The equivalent emission limit for air-dried items is 6.7 lbs. VOC/gallon solids. The equivalent emission limit for clear-coated items is 10.3 lbs. VOC/gallon solids. The equivalent emission limit for extreme performance coatings is 6.7 lbs. VOC/gallon solids. The equivalent emission limit for other coatings and systems is 5.1 lbs. VOC/gallon solids.

If more than one emission limitation indicated in this section applies to a specific coating, then the least stringent emission limitation shall apply. All volatile organic compound emissions from solvent washing involved in a coating process shall be considered in the emission limitations set above, unless the solvent is directed into containers that prevent evaporation into the atmosphere.

Specialty coatings are exempted from the requirement of this provision. [Authority granted under R307-340-11; condition originated in DAQE-AN0156012-06]

II.B.2.b.1

Monitoring:

By the 15th of each month, the permittee shall determine compliance with R307-340-11. Compliance calculation procedures shall meet the requirements of R307-340-15(2)c.

II.B.2.b.2

Recordkeeping:

The permittee shall maintain records of the daily use of all coatings and other materials that may be a source of VOC emissions. The recording format shall meet the requirements of R307-340 and shall contain all the information necessary to determine compliance with the VOC content limits on a daily basis. Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.

II.B.2.b.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.3

Conditions on Paint Booths (02)

II.B.3.a

Condition:

While in operations, the static pressure differential across the fiber filter shall be between 0.25 and 1.0 inches of water column. All readings shall be accurate to within plus or minus 0.1 inches water column. [Authority granted under R307- 401-8(1)a [BACT]; condition originated in DAQE-AN0156012-06]

II.B.3.a.1

Monitoring:

Each coating booth shall be equipped with a manometer or pressure gauge to measure the differential pressure across the fiber filters. All pressure gauges shall be located such that an inspector/operator can safely read the indicator at any time. Once per operating day the permittee shall verify that the differential pressure is within the permitted range.

II.B.3.a.2

Recordkeeping:

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.3.a.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.3.b

Condition:

All paint spray booths shall be equipped with paint arrester particulate filters. All air exiting the booth shall pass through this control system before being vented to the atmosphere (outside building/operation). [Authority granted under R307-401-8(1)(a) [BACT]; condition originated in DAQE-AN0156012-06]

II.B.3.b.1

Monitoring:

Visual inspections of paint booth filter type, installation, and condition shall be made daily, while in operation, by the permittee to determine compliance with this permit condition.

II.B.3.b.2

Recordkeeping:

A log shall be kept on the results of visual inspections of the paint booth filters. Filters that are damaged, clogged, improperly installed, incorrect filters installed or any other circumstance that limits filter effectiveness shall be documented.

II.B.3.b.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.4

Conditions on Dip Coating Tanks (03)

II.B.4.a

Condition:

All coatings used in the dip coating tank located at the 1111 South 1000 West location shall contain less than 0.1 percent VOCs. [Authority granted under R307-401-8(1)(a) [BACT]; condition originated in DAQE-AN0156012-06]

II.B.4.a.1

Monitoring:

Records required for this permit condition will serve as monitoring.

II.B.4.a.2

Recordkeeping:

Material Safety Data Sheets shall be maintained for the coating used in the dip tank at the 1111 South 1000 West location.

II.B.4.a.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.5

Conditions on Abrasive Blast Booths (06)

II.B.5.a

Condition:

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-206 and R307-401-8(1)(a) [BACT]; condition originated in DAQE-AN0156012-06]

II.B.5.a.1

Monitoring:

1. A visual opacity survey of each affected emission unit shall be performed on a weekly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. If visible emissions other than steam are observed from an emission unit, an opacity determination of that

emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9.

2. Visible emissions from unconfined blasting shall be measured at the densest point of the emission after a major portion of the spent abrasive has fallen out, at a point not less than five feet nor more than twenty-five feet from the impact surface from any single abrasive blasting nozzle.

3. An unconfined blasting operation that uses multiple nozzles shall be considered a single source unless it can be demonstrated by the owner or operator that each nozzle, measured separately, meets the emission and performance standards provided in R307-206-2 through 4.

4. Visible emissions from confined blasting shall be measured at the densest point after the air contaminant leaves the enclosure.

II.B.5.a.2

Recordkeeping:

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit.

If an opacity determination is indicated, all data required by 40 CFR 60, Appendix A, Method 9 shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.5.a.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.5.b

Condition:

Manometers shall be installed on each blast booth to measure the differential pressure across the fabric filters. While in operation, the static pressure differential across the fabric filter of each blast booth shall be maintained within manufacturer's specifications. [Authority granted under R307-401-8(1)(a) [BACT]; condition originated in DAQE-AN0156012-06]

II.B.5.b.1

Monitoring:

Once per operating day the permittee shall verify that the differential pressure is within the permitted range. All pressure gauges shall be located such that an inspector/operator can safely read the indicator at any time. All readings shall be accurate to within plus or minus 0.1 inches water column.

II.B.5.b.2

Recordkeeping:

Results of pressure drop readings shall be recorded and maintained as described in Provision S.1 in Section I of this permit. In addition, documentation of the manufacturer's recommended pressure differential for the fabric filter shall be kept onsite.

II.B.5.b.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.6 **Conditions on Externally Vented Dust Collection Systems (07)**

II.B.6.a **Condition:**

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-8(1)(a) [BACT]; condition originated in DAQE-AN0156012-06]

II.B.6.a.1 **Monitoring:**

A visual opacity survey of each affected emission unit shall be performed on a weekly basis by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. If visible emissions other than steam are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9.

II.B.6.a.2 **Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit.

If an opacity determination is indicated, all data required by 40 CFR 60, Appendix A, Method 9 and/or 58 FR 61640 Method 203A shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.6.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.6.b **Condition:**

Manometers shall be installed on each coating booth to measure the differential pressure across the fabric filters. While in operation, the static pressure differential across the fabric filter of each blast booth shall be maintained within manufacturer's specifications. [Authority granted under R307-401-8(1)(a) [BACT]; condition originated in DAQE-AN0156012-06]

II.B.6.b.1 **Monitoring:**

Once per operating day the permittee shall verify that the differential pressure is within the permitted range. All pressure gauges shall be located such that an inspector/operator can safely read the indicator at any time. All readings shall be accurate to within plus or minus 0.1 inches water column.

II.B.6.b.2 **Recordkeeping:**

Results of pressure drop readings shall be recorded and maintained as described in Provision S.1 in Section I of this permit. In addition, documentation of the manufacturer's recommended pressure differential for the fabric filter shall be kept onsite.

II.B.6.b.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.7

Conditions on Emergency Power Generator (09)

II.B.7.a

Condition:

Hours of operation for maintenance firing purposes shall be no greater than 25 hours per rolling 12 month period for each generator. With the exception of maintenance firings, emergency power generators shall only be operated during power outages. [Authority granted under R307-401-8(1)(a) [BACT]; condition originated in DAQE-AN0156012-06]

II.B.7.a.1

Monitoring:

Records required for this permit condition will serve as monitoring.

II.B.7.a.2

Recordkeeping:

Records of the date of usage, the hours of operation, and the amount of fuel used for maintenance firing purposes and emergency use shall be kept on a monthly basis for each affected emission unit. Results of monitoring shall be maintained as described in Provision I.S.1 of this permit.

II.B.7.a.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.C.

Emissions Trading.

(R307-415-6a(10))

Not applicable to this source.

II.D.

Alternative Operating Scenarios.

(R307-415-6a(9))

Not applicable to this source.

Section III: PERMIT SHIELD

A permit shield was not granted for any specific requirements.

Section IV: ACID RAIN PROVISIONS.

This source is not subject to Title IV. This section is not applicable.

REVIEWER COMMENTS

This operating permit incorporates all applicable requirements contained in the following documents:

DAQE-AN0156012-06

dated March 6, 2006

1. Comment on an item originating in DAQE-AN0156012-06, Condition 15 regarding permitted source (Source-wide)

Fuel Design Requirements: The permittee shall use only natural gas, or liquid propane gas (LPG), or any other mixed gas that meets the standards of gas distributed by a utility in accordance with the rules of Public Service Commission of the State of Utah as fuel. This is a design requirement which has been verified through site inspection. As there are no obvious environmental benefits gained by imposing additional monitoring, recordkeeping and/or reporting requirements to this condition, it has not been incorporated into the operating permit. [Comment last updated on 11/05/2007]

2. Comment on an item originating in DAQE-AN0156012-06, Condition 12 regarding permitted source (Source-wide)

Fugitive Dust Plan: Utility Trailer's trailer parking areas at all three locations shall be covered with gravel for dust control. Other roads, driveways and automobile parking areas must be paved. This fugitive dust control requirement has been subsumed by the requirements of R307-309 to submit and abide by an approved Fugitive Dust Control Plan . [Comment last updated on 11/05/2007]

3. Comment on an item originating in DAQE-AN0156012-06, Condition 22 regarding permitted source (Source-wide)

O & M Conditions: Maintenance and operation of any equipment approved under DAQE-AN0156012-06 including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Based on the current Approval Order language, this requirement is limited to permitted emission units and to equipment which, in case of malfunction, could cause or contribute to a violation of a condition on the permit. These same limitations are hereby incorporated into the Operating Permit. [Comment last updated on 11/05/2007]

4. Comment on an item originating in DAQE-AN0156012-06, Condition 20 regarding Surface Coating Operations (Unit 01)

Paint Booth Design Issues: Except for touch-up operations, coating operations shall be performed using airless spray, HVLP spray, dip coating, roller coating or other equipment/methods approved by the Executive Secretary. These are design requirements already verified through inspection. Since the emission unit descriptions in Section IIA already include these transfer system specifications, this requirement will not be carried into the Operating Permit. [Comment last updated on 11/05/2007]

5. Comment on an item originating in DAQE-AN0156012-06 regarding permitted source (Source-wide)

NSPS and NESHAP applicability: Despite having a significant level of allowable emissions, none of Utility Trailer's operations are subject to any currently promulgated New Source Performance Standard (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP). The NESHAP for Surface Coating of Miscellaneous Metal Parts (40 CFR 63, Subpart M MMM) applies to HAP major sources. Utility Trailer is not a HAP major source so the rule does not apply. [Comment last updated on 11/05/2007]

6. Comment on an item originating in DAQE-AN0156012-06, Condition 8.U regarding Abrasive Blast Booth

Changes Made: Updated rule numbers. Added R307-206 Monitoring requirements. Increased quantity of Abrasive Blast Booths. [Comment last updated on 11/05/2007]

7. Comment on item originating in this permit regarding Davis Co. not being a non-attainment or maintenance area

The previous version of this permit referenced R307-309 PM10 Maintenance Area requirements which do not apply to Davis County. The requirements were removed.

8. Comment on an item originating in CAM Applicability

CAM applicability has been evaluated. There are no CAM requirements in this permit. [Comment last updated on 11/05/2007]

9. Comment on an item originating in DAQE-AN0156012-06, Condition 14 regarding R307-206 Abrasive Blasting

Abrasive Blasting: The opacity limitation in this rule is less stringent than the A.O., so it has not been incorporated into the operating permit. [Comment last updated on 12/07/2007]

10. Comment on an item originating in DAQE-AN0156012-06, Condition 18.C Dip Coating Tank

The previous version of this permit said the tank shall contain no VOCs. The previous approval orders said the tanks shall contain less than 0.1 percent VOCs. This change has been incorporated into the operating permit. [Comment last updated on 12/07/2007]