

# **Statement of Basis**

**Permit to Construct No. P-2013.0056  
Project ID 62056**

**Mobile Component, Inc.  
Boise, Idaho**

**Facility ID 001-00296**

**Final**

**August 9, 2018  
Tom Burnham  
Permit Writer**

LB

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

<b>ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....</b>	<b>3</b>
<b>FACILITY INFORMATION.....</b>	<b>5</b>
Description .....	5
Permitting History .....	5
Application Scope .....	5
Application Chronology.....	5
<b>TECHNICAL ANALYSIS.....</b>	<b>6</b>
Emissions Units and Control Equipment .....	6
Emissions Inventories .....	9
Ambient Air Quality Impact Analyses.....	11
<b>REGULATORY ANALYSIS .....</b>	<b>12</b>
Attainment Designation (40 CFR 81.313) .....	12
Facility Classification.....	12
Permit to Construct (IDAPA 58.01.01.201).....	13
Tier II Operating Permit (IDAPA 58.01.01.401).....	13
Visible Emissions (IDAPA 58.01.01.625).....	13
Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70).....	13
PSD Classification (40 CFR 52.21) .....	13
NSPS Applicability (40 CFR 60).....	13
NESHAP Applicability (40 CFR 61).....	13
MACT/GACT Applicability (40 CFR 63).....	13
Permit Conditions Review .....	25
<b>PUBLIC REVIEW.....</b>	<b>26</b>
Public Comment Opportunity .....	26
<b>APPENDIX A – EMISSIONS INVENTORIES.....</b>	<b>27</b>
<b>APPENDIX B – FACILITY DRAFT COMMENTS.....</b>	<b>28</b>
<b>APPENDIX C – PROCESSING FEE.....</b>	<b>31</b>

## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BMP	best management practices
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CAS No.	Chemical Abstracts Service registry number
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CMS	continuous monitoring systems
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	CO <sub>2</sub> equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
eq	equipment
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
GACT	Generally Available Control Technology
gpd	gallons per day
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
iwg	inches of water gauge
km	kilometers
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
MCI	Mobile Component, Inc.
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O <sub>2</sub>	oxygen
PAH	polyaromatic hydrocarbons
PC	permit condition

PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compounds
µg/m <sup>3</sup>	micrograms per cubic meter

## FACILITY INFORMATION

### **Description**

Mobile Component, Inc. is a steel fabrication company specializing in manufacturing chassis and miscellaneous steel parts for modular building industry. Manufacturing consists of several processes including raw material storage, welding chassis components, application of protective coating, assembly of parts, and shipment.

The main sources of emissions are welding, grinding, coating, and natural gas combustion of the heaters.

At the time of permit issuance, all productions are performed under one building structure that has several separate rooms, such as two paint booths, welding, grinding, and assembling room, and machining room. The building has gates, doors, and exhaust vents. An air cleaner also called smog-hog fume collector is located at the center of the welding, grinding, and assembling room. It collects the captured particulates from the intake air and resends the cleaned air back to the room. Part of the air in the room is taken into the smog-hog fume collector through two vertical squared ducts with two duck openings near the roof of the room.. Adjacent to the welding, grinding, and assembling room are the two separate paint booths. Each paint booth has its own filter system with three exhaust vents on the side of the wall with various heights. All the spray guns are high volume, low pressure (HVLP) type or equivalent with 65% or greater material transfer efficiency. The permit will only impose control requirements in accordance with 40 CFR 63 Subpart HHHHHH if Mobile Component, Inc. is not exempt from this subpart.

### **Permitting History**

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

December 15, 2017	P-2013.0056 PROJ 61963 - Facility name change to Mobile Component, Inc. from Mobile Component Distributors, Inc., Permit status (A, but will become S upon issuance of this permit)
June 27, 2014	P-2013.0056 PROJ 61288 - Initial PTC for a painting, welding, machine shop. Consent Order driven action. Case No. E-2012.0015 [v2], Permit status (S)

### **Application Scope**

PTC is for a minor modification at an existing minor facility.

The applicant has proposed to:

- Install and operate a new paint booth with heater
- Increase welding rod usage

### **Application Chronology**

April 27, 2018	DEQ received an application and an application fee.
May 7 – May 22, 2018	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
May 3, 2018	DEQ determined that the application was incomplete.
June 1, 2018	DEQ received supplemental information from the applicant.
June 7, 2018	DEQ determined that the application was complete.
June 12, 2018	DEQ made available the draft permit and statement of basis for peer and regional office review.
June 22, 2018	DEQ made available the draft permit and statement of basis for applicant review.

August 6, 2018

DEQ received the permit processing fee.

August 9, 2018

DEQ issued the final permit and statement of basis.

## TECHNICAL ANALYSIS

### *Emissions Units and Control Equipment*

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emission Point ID No.
	Fugitives	Best Management Practices (BMP)	
1	Combustion Sources <u>Shop Heaters</u> Manufacturer: Modine Model: PA 300A Heat input rating: 0.24 MMBtu/hr Fuel: Natural gas	None	Shop exhaust
2	Manufacturer: Reznor Model: UBAP 3000 Heat input rating: 0.24 MMBtu/hr Fuel: Natural gas	None	Shop exhaust
3,4	Two with the following parameters: Manufacturer: Modine Model: PDP300AE0130 Heat input rating: 0.24 MMBtu/hr each Fuel: Natural gas	None	Shop exhaust
5	<u>Paint Booth Heater</u> Manufacturer: Carrier Model: 58MXA Construction date: 2018 Heat input rating: 0.25 MMBtu/hr Fuel: Natural gas	None	None

**Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION (continued)**

Source ID No.	Sources	Control Equipment	Emission Point ID No.
6	<p>North spray booth filter system                      Manufacturer: Mobile Component-Built                      Construction date: 1972</p>	<p><u>North spray booth filter system</u>                      Manufacturer: Mobile Component-Built                      Construction date: 1972                      Booth type: side draft                      Particulate filtration method: dry filters                      Manufacturer: Mobile Component-Built                      PM Control Efficiency(%): at least 98%</p>	<p>North 1-3 side vents</p>
7	<p>South spray booth filter system:                      Manufacturer: Mobile Component-Built</p>	<p><u>South spray booth filter system:</u>                      Manufacturer: Mobile Component-Built                      Construction date: 1972                      Booth type: side draft                      Particulate filtration method: dry filters                      Manufacturer: Mobile Component-Built                      PM Control Efficiency(%): at least 98%</p>	<p>South 1-3 side vents</p>
8	<p>Northwest paint booth                      Manufacturer: Mobile Component-Built                      Construction date: 2018</p>	<p><u>Northwest paint booth</u>                      Manufacturer: Mobile Component-Built                      Construction date: 2018                      Booth type: side draft                      Particulate filtration method: dry filters                      Manufacturer: Booth Filter Store                      Model: XD-22F                      PM Control Efficiency(%): at least 98%</p> <p><u>Spray guns</u>                      Three types of guns are used at the facility. Five spray guns can be used simultaneously at each spray booth.</p> <p><u>Type 1:</u>                      Manufacturer: Husky or equivalent                      Model: H4840GHVSG or equivalent (eq)                      Type: HVLP or equivalent                      Transfer efficiency: 65%                      Rated capacity: unknown</p> <p><u>Type 2:</u>                      Manufacturer: Central Pneumatic or eq.                      Model: 93305 or equivalent                      Type: HVLP or equivalent                      Transfer efficiency: 65%                      Rated capacity: unknown</p> <p><u>Type3:</u>                      Manufacturer: Graco or equivalent                      Model: FinishPro II 395 PC or equivalent                      Type: Air-Assisted Airless or equivalent                      Transfer efficiency:70%                      Rated capacity: 0.43 GPM</p>	<p>None</p>

9	<u>Welding:</u> Manufacturer: NA Model: NA Construction date: 1972 Gas Metal Arc Welding (GMAW) Flux Cored Arc Welding (FCAW) Shielded Metal Arc Welding (SMAW)	None	Various doors, window, vents
10	<u>Grinding</u> Pedestal grinders Hand-held grinders		

## Emissions Inventories

### Pre-Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

The following table presents the pre-project potential to emit for all criteria pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

**Table 2 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>
Heaters	0.0007	0.003	5E-05	2.0 E04	0.0071	0.031	0.0023	0.01	0.0004	0.0018
Welding	0.0251	0.11	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grinding-welds	0.0089	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grinding-grinding wheels	0.0104	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paint Booths	0.003	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.4064	1.78
<b>Pre-Project Totals</b>	<b>0.05</b>	<b>0.21</b>	<b>0.00</b>	<b>0.00</b>	<b>0.01</b>	<b>0.03</b>	<b>0.00</b>	<b>0.01</b>	<b>0.41</b>	<b>1.78</b>

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits. In this case, the operating hours of the heaters was used as a basis: ie. 8,760 hours.  
 b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

### Post Project Potential to Emit

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility's classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria pollutants from all emissions units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

**Table 3 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>
Heaters	0.0097	0.04	0.0008	0.00	0.1257	0.55	0.1019	0.45	0.0069	0.03
Welding	0.0547	0.24	0.0	0.0	0.02	0.11	0.02	0.09	0.001	0.006
Grinding-welds	0.0089	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Grinding-grinding wheels	0.0104	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paint Booths	0.0373	0.16	0.00	0.00	0.00	0.00	0.00	0.00	0.9518	4.17
<b>Post Project Totals</b>	<b>0.12</b>	<b>0.53</b>	<b>0.00</b>	<b>0.00</b>	<b>0.15</b>	<b>0.66</b>	<b>0.12</b>	<b>0.54</b>	<b>0.96</b>	<b>4.21</b>

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits. In this case, the operating hours of the heaters was used as a basis: ie. 8760 hours.  
 b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

### Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

**Table 4 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	0.05	0.21	0.00	0.00	0.01	0.03	0.00	0.01	0.41	1.78
Post Project Potential to Emit	0.12	0.53	0.00	0.00	0.15	0.66	0.12	0.54	0.96	4.21
<b>Changes in PTE</b>	<b>0.07</b>	<b>0.32</b>	<b>0.00</b>	<b>0.00</b>	<b>0.14</b>	<b>0.63</b>	<b>0.12</b>	<b>0.53</b>	<b>0.55</b>	<b>2.43</b>

## TAP Emissions

Pre- and post-project, as well as the change in, non-carcinogenic TAP emissions are presented in the following table:

**Table 5 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR TOXIC AIR POLLUTANTS**

Toxic Air Pollutants	Pre-Project Emissions Rates for Units at the Facility (lb/hr)	Post Project Emissions Rates for Units at the Facility (lb/hr)	Change in Emissions Rates for Units at the Facility (lb/hr)	Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Aluminum	2.26E-03	2.26E-03	0.00E+00	6.67E-01	No
Aluminum oxide	8.79E-02	8.79E-02	9.56E-06	6.67E-01	No
Barium	1.38E-06	6.60E-06	5.22E-06	3.30E-02	No
2-Butoxyethanol	0.00E+00	1.53E-01	1.53E-01	8.00E+00	No
Calcium Carbonate	4.29E-04	4.29E-04	0.00E+00	6.67E-01	No
Carbon Black	4.86E-02	4.86E-02	0.00E+00	2.30E-01	No
Chromium	2.26E-03	2.35E-03	9.29E-05	3.30E-02	No
Cobalt	7.52E-04	7.52E-04	9.96E-08	3.30E-03	No
Copper	1.50E-03	1.98E-03	4.79E-04	6.70E-02	No
Dichlorobenzene	0.00E+00	1.42E-06	1.42E-06	2.00E+01	No
Ethylbenzene	1.53E+00	1.53E+00	0.00E+00	3.33E-01	No
Hexane	5.65E-04	2.70E-03	2.14E-03	3.33E-01	No
Iron Oxide Fume	1.07E-02	4.82E-02	3.75E-02	3.33E-01	No
Kaolin	0.00E+00	2.07E-02	2.07E-02	1.33E-01	No
Magnesium Oxide	1.50E-03	1.81E-03	3.11E-04	6.70E-02	No
Manganese Dust and Compounds	0.00E+00	4.51E-07	4.51E-07	3.33E-01	No
Manganese Fume	4.66E-03	6.74E-03	2.08E-03	6.70E-02	No
Mercury	0.00E+00	3.08E-07	3.08E-07	3.00E-03	No
1-methoxy-2-propanol acetate	1.13E+00	1.13E+00	0.00E+00	3.33E-01	No
Molybdenum	0.00E+00	4.94E-04	4.94E-04	3.33E-01	No
Naphthalene	1.91E-07	9.15E-07	7.24E-07	3.33E+00	No
Selenium	7.53E-09	3.60E-08	2.85E-08	1.30E-02	No
Silica - quartz	3.51E-03	9.82E-03	6.31E-03	6.70E-03	No
Silicon	3.18E-03	4.28E-03	1.10E-03	6.67E-01	No
Silicon Dioxide	0.00E+00	0.00E+00	0.00E+00	6.67E-01	No
Toluene	9.11E+00	9.11E+00	0.00E+00	2.50E+01	No
Xylene	4.02E-01	4.02E-01	0.00E+00	2.90E+01	No
Zinc Metal	9.10E-06	4.35E-05	3.44E-05	6.67E-01	No
Zinc Oxide	8.05E-02	8.05E-02	0.00E+00	6.67E-01	No
Zirconium	1.20E-02	1.20E-02	9.56E-06	3.33E-01	No
Arsenic	5.36E-08	2.9E-07	2.4E-07	1.5E-06	No
Benzene	5.63E-07	3.1E-06	2.5E-06	8.0E-04	No
Beryllium	3.22E-09	1.7E-08	1.4E-08	2.8E-05	No
Cadmium	3.22E-09	1.3E-06	1.3E-06	3.7E-06	No
Chromium+6	0.00E+00	0.0E+00	0.0E+00	5.6E-07	No
Formaldehyde	2.01E-05	1.1E-04	8.9E-05	5.1E-04	No
3-Methylchloranthene	4.83E-01	4.8E-01	2.1E-09	2.5E-06	No
Nickel	1.50E-03	1.527E-03	2.67E-05	2.7E-05	No
Polyaromatic Hydrocarbon (Max)	0.00E+00	8.1E-07	8.1E-07	9.1E-05	No
Polycyclic Organics: 7-PAH Group	3.06E-09	1.7E-08	1.4E-08	2.0E-06	No

All changes in emissions rates for TAP were below EL (screening emissions level) as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the screening ELs identified in IDAPA 58.01.01.585/586 were exceeded.

### Post Project HAP Emissions

The following table presents the post project potential to emit for HAP pollutants from all emissions units at the facility modified as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

**Table 6 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY**

Hazardous Air Pollutants	PTE (lb/hr)	PTE (T/yr)
2-methylnaphthalene	5.11E-08	2.24E-07
3-methylchloranthene	3.83E-09	1.68E-08
2-Dimethylbenz(a)anthracene	1.51E-08	6.60E-08
Acenaphthene	3.83E-09	1.68E-08
Acenaphthylene	1.69E-03	7.42E-03
Anthracene	5.11E-09	2.24E-08
Arsenic	4.25E-07	1.86E-06
Benzene	4.47E-06	1.96E-05
Benzo(g,h,i)perylene	1.27E-08	5.57E-08
Beryllium	3.68E-08	1.61E-07
Cadmium	2.34E-06	1.02E-05
Chromium	6.80E-05	2.98E-04
Cobalt	2.20E-04	9.63E-04
Dichlorobenzene	2.55E-06	1.12E-05
Ethylbenzene	1.76E-01	7.72E-01
Fluoranthene	6.39E-09	2.80E-08
Fluorene	5.95E-09	2.60E-08
Formaldehyde	1.60E-04	6.99E-04
Hexane	3.83E-03	1.68E-02
HMDI	0.00E+00	0.00E+00
Lead	5.93E-07	2.60E-06
Manganese	1.48E-03	6.49E-03
Mercury	5.53E-07	2.42E-06
Molybdenum	1.11E-03	4.84E-03
Naphthalene	1.30E-06	5.68E-06
Nickel	1.53E-03	6.72E-03
Phenanthrene	3.62E-08	1.58E-07
Polycyclic Organic Matter (PAH MAX.)	8.20E-07	3.59E-06
Pyrene	1.06E-08	4.66E-08
Selenium	5.11E-08	2.24E-07
Toluene	4.64E-02	2.03E-01
Xylene	1.05E+00	4.59E+00
<b>Totals</b>	<b>1.28E+00</b>	<b>5.61E+00</b>

### **Ambient Air Quality Impact Analyses**

As presented in the Emissions Inventory in Appendix A, the estimated emission rates of, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, HAP, and TAP from this project were below applicable screening emission levels (EL) and published DEQ modeling thresholds established in IDAPA 58.01.01.585-586 and in the State of Idaho Air Quality Modeling Guideline<sup>1</sup>. Refer to the Emissions Inventories section for additional information concerning the emission inventories.

<sup>1</sup> Criteria pollutant thresholds in Table 2, State of Idaho Guideline for Performing Air Quality Impact Analyses, Doc ID AQ-011, September 2013.

## REGULATORY ANALYSIS

### Attainment Designation (40 CFR 81.313)

The facility is located in Ada County, which is designated as attainment or unclassifiable for PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

### Facility Classification

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

- A = Use when any one HAP has actual or potential emissions  $\geq 10$  T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions  $\geq 25$  T/yr.
- SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits  $\geq 8$  T/yr of a single HAP or  $\geq 20$  T/yr of THAP.
- SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to  $< 8$  T/yr of a single HAP and/or  $< 20$  T/yr of THAP.
- B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold
- UNK = Class is unknown

For All Other Pollutants:

- A = Actual or potential emissions of a pollutant are  $\geq 100$  T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are  $\geq 80$  T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are  $< 80$  T/yr.
- B = Actual and potential emissions are  $< 100$  T/yr without permit restrictions.
- UNK = Class is unknown.

Table 7 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	24.63	0.21	100	B
PM <sub>10</sub>	24.63	0.21	100	B
PM <sub>2.5</sub>	24.63	0.21	100	B
SO <sub>2</sub>	0.0	0.0	100	B
NO <sub>x</sub>	0.91	0.03	100	B
CO	0.60	0.01	100	B
VOC	16.36	1.78	100	B
HAP (single)	0.77	0.8	10	B
HAP (total)	5.64	5.61	25	B
Pb	0.0	0.0	100	B

**Permit to Construct (IDAPA 58.01.01.201)**

IDAPA 58.01.01.201 ..... Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the modified emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

**Tier II Operating Permit (IDAPA 58.01.01.401)**

IDAPA 58.01.01.401 ..... Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

**Visible Emissions (IDAPA 58.01.01.625)**

IDAPA 58.01.01.625 ..... Visible Emissions

The sources of PM emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.7 through 2.9.

**Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)**

IDAPA 58.01.01.301 ..... Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, and HAP or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

**PSD Classification (40 CFR 52.21)**

40 CFR 52.21 ..... Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

**NSPS Applicability (40 CFR 60)**

The facility is not subject to any NSPS requirements 40 CFR Part 60.

**NESHAP Applicability (40 CFR 61)**

The facility is not subject to any NESHAP requirements in 40 CFR 61.

**MACT/GACT Applicability (40 CFR 63)**

The facility has proposed to operate as a minor source of hazardous air pollutant (HAP) emissions, and is subject to the requirements of 40 CFR 63, Subpart HHHHHH–National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. DEQ is delegated this Subpart.

**§ 63.11169 What is the purpose of this subpart?**

Except as provided in paragraph (d) of this section, this subpart establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in any of the activities in paragraphs (a) through (c) of this section. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards contained herein.

- (a) Paint stripping operations that involve the use of chemical strippers that contain methylene chloride (MeCl), Chemical Abstract Service number 75092, in paint removal processes;
- (b) Autobody refinishing operations that encompass motor vehicle and mobile equipment spray applied surface coating operations;
- (c) Spray application of coatings containing compounds of chromium (Cr), lead (Pb), manganese(Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.
- (d) This subpart does not apply to any of the activities described in paragraph (d)(1) through (6) of this section.
  - (1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.
  - (2) Surface coating or paint stripping of military munitions, as defined in §63.11180, manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State) or equipment directly and exclusively used for the purposes of transporting military munitions.
  - (3) Surface coating or paint stripping performed by individuals on their personal vehicles, possessions, or property, either as a hobby or for maintenance of their personal vehicles, possessions, or property. This subpart also does not apply when these operations are performed by individuals for others without compensation. An individual who spray applies surface coating to more than two motor vehicles or pieces of mobile equipment per year is subject to the requirements in this subpart that pertain to motor vehicle and mobile equipment surface coating regardless of whether compensation is received.
  - (4) Surface coating or paint stripping that meets the definition of “research and laboratory activities” in §63.11180.
  - (5) Surface coating or paint stripping that meets the definition of “quality control activities” in §63.11180.
  - (6) Surface coating or paint stripping activities that are covered under another area source NESHAP.

*Mobile Component spray-applies surface coatings on mobile home chassis that are considered mobile equipment. In addition, the spray-application of surface coatings to metal as performed by Mobile Component is not covered under another area source NESHAP.*

**§ 63.11170 Am I subject to this subpart?**

- (a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section: (1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.
- (2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.

(b) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

*Mobile Component spray-applies coatings to mobile equipment. Consequently, these requirements potentially apply to Mobile Component. Mobile Component does not spray coat metal substrate with coatings containing target HAPs and a petition for exemption was submitted to the EPA in May 2018. Mobile Component does not perform paint stripping using methylene chloride. Mobile Component is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions.*

### **§ 63.11171 How do I know if my source is considered a new source or an existing source?**

- (a) This subpart applies to each new and existing affected area source engaged in the activities listed in §63.11170, with the exception of those activities listed in §63.11169(d) of this subpart.
- (b) The affected source is the collection of all of the items listed in paragraphs (b)(1) through (6) of this section. Not all affected sources will have all of the items listed in paragraphs (b)(1) through (6) of this section.
- (1) Mixing rooms and equipment;
  - (2) Spray booths, ventilated prep stations, curing ovens, and associated equipment;
  - (3) Spray guns and associated equipment;
  - (4) Spray gun cleaning equipment;
  - (5) Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint; and
- (c) An affected source is a new source if it meets the criteria in paragraphs (c)(1) and (c)(2) of this section.
- (1) You commenced the construction of the source after September 17, 2007 by installing new paint stripping or surface coating equipment. If you purchase and install spray booths, enclosed spray gun cleaners, paint stripping equipment to reduce MeCl emissions, or purchase new spray guns to comply with this subpart at an existing source, these actions would not make your existing source a new source.
  - (2) The new paint stripping or surface coating equipment is used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.
- (d) An affected source is an existing source if it is not a new source or a reconstructed source. In accordance with §63.11171(b), the mobile equipment coating operation is the collection of mixing equipment; spray booths and associated equipment; spray guns and associated equipment; spray gun cleaning equipment; and equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint. Paint stripping is not proposed as a business activity.

*In accordance with §63.11171(b), the mobile equipment coating operation is the collection of mixing equipment; spray booths and associated equipment; spray guns and associated equipment; spray gun cleaning equipment; and equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint. Paint stripping is not proposed as a business activity.*

*In accordance with §63.11171(c), this mobile equipment coating operation is an existing source because it commenced construction prior to September 17, 2007, by installing new surface coating equipment, and the new surface coating equipment will be used at a source that was actively engaged in miscellaneous surface coating prior to September 17, 2007.*

### **§63.11172 When do I have to comply with this subpart?**

The date by which you must comply with this subpart is called the compliance date. The compliance date for each type of affected source is specified in paragraphs (a) and (b) of this section.

For a new or reconstructed affected source, the compliance date is the applicable date in paragraph (a)(1) or (2) of this section:

If the initial startup of your new or reconstructed affected source is after September 17, 2007, the compliance date is January 9, 2008.

If the initial startup of your new or reconstructed affected source occurs after January 9, 2008, the compliance date is the date of initial startup of your affected source.

*In accordance with §63.11172(a)(2), because the initial startup of the facility occurred prior to January 9, 2008, the compliance date is January 10, 2011.*

**§63.11173 What are my general requirements for complying with this subpart?**

Each motor vehicle and mobile equipment surface coating operation and each miscellaneous surface coating operation must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (f) of this section. The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in paragraph (f) of this section.

All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14 of subpart A of this part). The test coating for measuring filter efficiency shall be a high solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-HVLP) air-atomized spray gun operating at 40 pounds per square inch (psi) air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.

Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.

Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

Mobile ventilated enclosures that are used to perform spot repairs must enclose and, if necessary, seal against the surface around the area being coated such that paint overspray is retained within the enclosure and directed to a filter to capture paint overspray.

All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002" (incorporated by reference, see §63.14 of subpart A of this part).

All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by

using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used. As provided in §63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to §63.6(g)(2).

Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section. (1) A list of all current personnel by name and job description who are required to be trained;

Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (f)(2)(i) through (2)(iv) of this section.

Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke. Routine spray booth and filter maintenance, including filter selection and installation. (iv)

Environmental compliance with the requirements of this subpart.

A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (f)(2) of this section are not required to provide the initial training required by that paragraph to these painters.

As required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

If your source is a new source, all personnel must be trained and certified no later than 180 days after hiring

Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

*Because the facility has not proposed paint-stripping activities, the requirements of §63.11173(a) through (f) are not applicable. Because the facility is a mobile equipment coating operation, in accordance with §63.11173(e), the permittee must meet the requirements of paragraphs (e)(1) through (e)(5) of this section. These sections are listed below. In accordance with §63.11173(f), each owner or operator of an affected mobile equipment coating operation must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.*

*§63.11173(e)(2), all spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of paragraph (e)(2)(i) of this section and either paragraph (e)(2)(ii), (e)(2)(iii), or (e)(2)(iv) of this section.*

*§63.11173(e)(3) All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, airassisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed above for a comparable operation, and for which written approval has been obtained from the Administrator.*

*The requirements of this paragraph do not apply to painting performed by students and instructors at paint training centers. The requirements of this paragraph do not apply to the surface coating of aerospace vehicles that involves the coating of components that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; to the application of coatings on aerospace vehicles that contain fillers that adversely affect atomization with HVLP spray guns; or to the application of coatings on aerospace vehicles that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).*

*§63.11173(e) (4) All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used.*

*§63.11173(e) (5) As provided in § 63.6(g), we, the U.S. Environmental Protection Agency, may choose to grant you permission to use an alternative to the emission standards in this section after you have requested approval to do so according to § 63.6(g)(2).*

*In accordance with §63.11173(g), as required by paragraph (e)(1) of this section, all new and existing personnel at an affected mobile equipment surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.*

-These requirements are ensured through permit condition 3.17.

#### **§ 63.11174 What parts of the General Provisions apply to me?**

Table 1 of this subpart shows which parts of the General Provisions in subpart A apply to you.

If you are an owner or operator of an area source subject to this subpart, you are exempt from the obligation to obtain a permit under 40 CFR part 70 or 71, provided you are not required to obtain a permit under 40 CFR 70.3(a) or 71.3(a) for a reason other than your status as an area source under this subpart.

Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart applicable to area sources.

In accordance with §63.11174(a), Table 1 of this subpart shows which parts of the General Provisions in subpart A apply.

*In accordance with §63.11174(a), Table 1 of this subpart shows which parts of the General Provisions in subpart A apply.*

*In accordance with §63.11174(b), an owner or operator of an area source subject to this subpart is exempt from the obligation to obtain a permit under 40 CFR part 70 or 71 provided that a permit under 40 CFR 70.3(a) or 71.3(a) is not required for a reason other than becoming an area source subject to this subpart. This permit application and permitting action involve a Permit to Construct, and will not utilize the requirements and procedures in IDAPA 58.01.01.300-399 for the issuance of Tier I operating permits.*

-This requirement is ensured through permit condition 3.18.

#### **§ 63.11175 What notifications must I submit?**

Initial Notification. If you are the owner or operator of a surface coating operation subject to this subpart, you must submit the initial notification required by §63.9(b). For a new affected source, you must submit the Initial Notification no later than 180 days after initial startup. The initial notification must provide the information specified in paragraphs (a)(1) through (8) of this section.

The company name, if applicable.

The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;

The street address (physical location) of the affected source and the street address where compliance records are maintained, if different. If the source is a motor vehicle or mobile equipment surface coating operation that repairs vehicles at the customer's location, rather than at a fixed location, such as a collision repair shop, the notification should state this and indicate the physical location where records are kept to demonstrate compliance; An identification of the relevant standard (i.e., this subpart, 40 CFR part 63, subpart HHHHHH);

A brief description of the type of operation as specified in paragraph (a)(5)(i) or (ii) of this section.

For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.

A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date. For surface coating operations, the relevant requirements are specified in §63.11173(e) through (g) of this subpart.

If your source is a new source, you must certify in the initial notification whether the source is in compliance with each of the requirements of this subpart. If you are certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

Notification of Compliance Status. If you are the owner or operator of a new source, you are not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided you were able to certify compliance on the date of the initial notification, as part of the initial notification, and your compliance status has not since changed.

*In accordance with §63.11175(a), because the facility is a surface coating operation subject to this subpart, the initial notification required by §63.9(b) must be submitted. For this existing operation, the Initial Notification must be submitted no later than on or before March 11, 2011. In accordance with §63.11175(b), because the facility is an existing source, the permittee is not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided the permittee was able to certify compliance on the date of the initial notification, as part of the initial notification, and the permittee's compliance status has not since changed. The permittee must submit a Notification of Compliance Status on or before March 11, 2011. The permittee is required to submit the information specified in paragraphs (b)(1) through (4) of this section with the Notification of Compliance Status.*

-These requirements are ensured through permit condition 3.19.

#### **§ 63.11176 What reports must I submit?**

(a) Annual Notification of Changes Report. If you are the owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, you are required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. This includes notification when paint stripping affected sources that have not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) used more than one ton of MeCl in the previous calendar year. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

(1) Your company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.

(2) The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to

achieve compliance.

(b) If you are the owner or operator of a paint stripping affected source that has not developed and implemented a written MeCl minimization plan in accordance with §63.11173(b) of this subpart, you must submit a report for any calendar year in which you use more than one ton of MeCl. This report must be submitted no later than March 1 of the following calendar year. You must also develop and implement a written MeCl minimization plan in accordance with §63.11173(b) no later than December 31. You must then submit a Notification of Compliance Status report containing the information specified in §63.11175(b) by March 1 of the following year and comply with the requirements for paint stripping operations that annually use more than one ton of MeCl in §§63.11173(d) and 63.11177(f).

*In accordance with §63.11176(a), because the permittee is an owner or operator of a mobile equipment surface coating affected source, the permittee is required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section. Because the facility has not proposed to conduct paint stripping operations, the MeCl minimization plan requirements are not applicable.*

#### **§ 63.11177 What records must I keep?**

If you are the owner or operator of a surface coating operation, you must keep the records specified in paragraphs (a) through (d) and (g) of this section.

Certification that each painter has completed the training specified in §63.11173(f) with the date the initial training and the most recent refresher training was completed.

Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in §63.11173(e)(3)(i).

Documentation from the spray gun manufacturer that each spray gun with a cup capacity equal to or greater than 3.0 fluid ounces (89 cc) that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun, according to the procedure in §63.11173(e)(4).

Copies of any notification submitted as required by §63.11175 and copies of any report submitted as required by §63.11176.

Records of any deviation from the requirements in §63.11173, §63.11174, §63.11175, or §63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation. (h) Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

*In accordance with §63.11177, because the permittee is the owner or operator of a surface coating operation, the permittee must keep the records specified in paragraphs (a) through (d) and (g) of this section. Because the permittee has not proposed to conduct paint stripping operations, the requirements of paragraphs (e) and (f) of this section are not applicable.*

-These requirements are ensured through permit conditions 3.19 and 3.20.

#### **§ 63.11178 In what form and for how long must I keep my records?**

If you are the owner or operator of an affected source, you must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

*In accordance with 40 CFR 63.11178(a) because the permittee is the owner or operator of an affected source, the permittee must maintain copies of the records specified in §63.11177 for a period of at least five years after the date*

of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two-year period. -This requirement is contained in permit condition 3.21.

#### **§ 63.11179 Who implements and enforces this subpart?**

This subpart can be implemented and enforced by us, the U.S. Environmental Protection Agency (EPA), or a delegated authority such as your State, local, or tribal agency. If the Administrator has delegated authority to your State, local, or tribal agency, then that agency (as well as the EPA) has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your State, local, or tribal agency. In delegating implementation and enforcement authority of this subpart to a State, local, or tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator and are not transferred to the State, local, or tribal agency. The authority in §63.11173(e)(5) will not be delegated to State, local, or tribal agencies.

*In accordance with §63.11179(a), this subpart can be implemented and enforced by the U.S. Environmental Protection Agency (EPA), or a delegated authority. At the time of this permitting action, the EPA has delegated authority to the State of Idaho. However, IDAPA 58.01.01.107.03i incorporates by reference all Federal Clean Air Act requirements including 40 CFR 63, Subpart HHHHHH. Therefore, the requirements of this subpart will be placed in the permit.*

-This requirement is ensured through permit condition 3.19

#### **§ 63.11180 What definitions do I need to know?**

Terms used in this subpart are defined in the Clean Air Act, in 40 CFR 63.2, and in this section as follows:

*Additive* means a material that is added to a coating after purchase from a supplier (e.g., catalysts, activators, accelerators).

*Administrator* means, for the purposes of this rulemaking, the Administrator of the U.S. Environmental Protection Agency or the State or local agency that is granted delegation for implementation of this subpart.

*Aerospace vehicle or component* means any fabricated part, processed part, assembly of parts, or completed unit, with the exception of electronic components, of any aircraft including but not limited to airplanes, helicopters, missiles, rockets, and space vehicles.

*Airless and air-assisted airless spray* mean any paint spray technology that relies solely on the fluid pressure of the paint to create an atomized paint spray pattern and does not apply any atomizing compressed air to the paint before it leaves the paint nozzle. Air-assisted airless spray uses compressed air to shape and distribute the fan of atomized paint, but still uses fluid pressure to create the atomized paint.

*Appurtenance* means any accessory to a stationary structure coated at the site of installation, whether installed or detached, including but not limited to: bathroom and kitchen fixtures; cabinets; concrete forms; doors; elevators; fences; hand railings; heating equipment, air conditioning equipment, and other fixed mechanical equipment or stationary tools; lamp posts; partitions; pipes and piping systems; rain gutters and downspouts; stairways, fixed ladders, catwalks, and fire escapes; and window screens.

*Architectural coating* means a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs.

*Cleaning material* means a solvent used to remove contaminants and other materials, such as dirt, grease, or oil, from a substrate before or after coating application or from equipment associated with a coating operation, such as spray booths, spray guns, racks, tanks, and hangers. Thus, it includes any cleaning material used on substrates or equipment or both.

*Coating* means, for the purposes of this subpart, a material spray-applied to a substrate for decorative, protective, or functional purposes. For the purposes of this subpart, coating does not include the following materials:

Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases,

or any combination of these substances.

Paper film or plastic film that may be pre-coated with an adhesive by the film manufacturer.

Adhesives, sealants, maskants, or caulking materials.

Temporary protective coatings, lubricants, or surface preparation materials. (5) In-mold coatings that are spray-applied in the manufacture of reinforced plastic composite parts.

*Compliance date* means the date by which you must comply with this subpart.

*Deviation* means any instance in which an affected source, subject to this subpart, or an owner or operator of such a source fails to meet any requirement or obligation established by this subpart.

*Dry media blasting* means abrasive blasting using dry media. Dry media blasting relies on impact and abrasion to remove paint from a substrate. Typically, a compressed air stream is used to propel the media against the coated surface.

*Electrostatic application* means any method of coating application where an electrostatic attraction is created between the part to be coated and the atomized paint particles.

*Equipment cleaning* means the use of an organic solvent to remove coating residue from the surfaces of paint spray guns and other painting related equipment, including, but not limited to stir sticks, paint cups, brushes, and spray booths.

*Facility maintenance* means, for the purposes of this subpart, surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. *Facility maintenance* also includes surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities. *Facility maintenance* includes the application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. *Facility maintenance* also includes the refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing. Such mobile equipment includes, but is not limited to, farm equipment and mining equipment for which it is not practical or feasible to move to a dedicated mobile equipment refinishing facility. Such mobile equipment also includes items, such as fork trucks, that are used in a manufacturing facility and which are refinished in that same facility. *Facility maintenance* does not include surface coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

*High-volume, low-pressure (HVL) spray equipment* means spray equipment that is permanently labeled as such and used to apply any coating by means of a spray gun which is designed and operated between 0.1 and 10 pounds per square inch gauge (psig) air atomizing pressure measured dynamically at the center of the air cap and at the air horns.

*Initial startup* means the first time equipment is brought online in a paint stripping or surface coating operation, and paint stripping or surface coating is first performed.

*Materials that contain HAP or HAP-containing materials* mean, for the purposes of this subpart, materials that contain 0.1 percent or more by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4), or 1.0 percent or more by mass for any other individual HAP.

*Military munitions* means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

*Miscellaneous parts and/or products* means any part or product made of metal or plastic, or

combinations of metal and plastic. Miscellaneous parts and/or products include, but are not limited to, metal and plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; automobiles and light duty trucks at automobile and light duty truck assembly plants; boats; sporting and recreational goods; toys; business machines; laboratory and medical equipment; and household and other consumer products.

*Miscellaneous surface coating operation* means the collection of equipment used to apply surface coating to miscellaneous parts and/or products made of metal or plastic, including applying cleaning solvents to prepare the surface before coating application, mixing coatings before application, applying coating to a surface, drying or curing the coating after application, and cleaning coating application equipment, but not plating. A single surface coating operation may include any combination of these types of equipment, but always includes at least the point at which a coating material is applied to a given part. A surface coating operation includes all other steps (such as surface preparation with solvent and equipment cleaning) in the affected source where HAP are emitted from the coating of a part. The use of solvent to clean parts (for example, to remove grease during a mechanical repair) does not constitute a miscellaneous surface coating operation if no coatings are applied. A single affected source may have multiple surface coating operations. Surface coatings applied to wood, leather, rubber, ceramics, stone, masonry, or substrates other than metal and plastic are not considered miscellaneous surface coating operations for the purposes of this subpart.

*Mobile equipment* means any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).

*Motor vehicle* means any self-propelled vehicle, including, but not limited to, automobiles, light duty trucks, golf carts, vans, and motorcycles.

*Motor vehicle and mobile equipment surface coating* means the spray application of coatings to assembled motor vehicles or mobile equipment. For the purposes of this subpart, it does not include the surface coating of motor vehicle or mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant.

*Non-HAP solvent* means, for the purposes of this subpart, a solvent (including thinners and cleaning solvents) that contains less than 0.1 percent by mass of any individual HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and less than 1.0 percent by mass for any other individual HAP.

*Paint stripping and/or miscellaneous surface coating source or facility* means any shop, business, location, or parcel of land where paint stripping or miscellaneous surface coating operations are conducted.

*Paint stripping* means the removal of dried coatings from wood, metal, plastic, and other substrates. A single affected source may have multiple paint stripping operations.

*Painter* means any person who spray applies coating.

*Plastic* refers to substrates containing one or more resins and may be solid, porous, flexible, or rigid. Plastics include fiber reinforced plastic composites.

*Protective oil* means organic material that is applied to metal for the purpose of providing lubrication or protection from corrosion without forming a solid film. This definition of protective oil includes, but is not limited to, lubricating oils, evaporative oils (including those that evaporate completely), and extrusion oils.

*Quality control activities* means surface coating or paint stripping activities that meet all of the following criteria:

The activities associated with a surface coating or paint stripping operation are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.

The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are surface coated or stripped are not sold and do not leave the facility.

The activities are not a normal part of the surface coating or paint stripping operation; for example, they do not include color matching activities performed during a motor vehicle collision repair. The activities do not involve surface coating or stripping of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

*Research and laboratory activities* means surface coating or paint stripping activities that meet one of the following criteria:

Conducted at a laboratory to analyze air, soil, water, waste, or product samples for contaminants, or environmental impact.

Activities conducted to test more efficient production processes, including alternative paint stripping or surface coating materials or application methods, or methods for preventing or reducing adverse environmental impacts, provided that the activities do not include the production of an intermediate or final product for sale or exchange for commercial profit.

Activities conducted at a research or laboratory facility that is operated under the close supervision of technically trained personnel, the primary purpose of which is to conduct research and development into new processes and products and that is not engaged in the manufacture of products for sale or exchange for commercial profit.

*Solvent* means a fluid containing organic compounds used to perform paint stripping, surface prep, or cleaning of surface coating equipment.

*Space Vehicle* means vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters).

*Spray-applied coating operations* means coatings that are applied using a hand-held device that creates an atomized mist of coating and deposits the coating on a substrate. For the purposes of this subpart, spray-applied coatings do not include the following materials or activities:

Coatings applied from a hand-held device with a paint cup capacity that is equal to or less than 3.0 fluid ounces (89 cubic centimeters).

Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.

Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

*Surface preparation* or *Surface prep* means use of a cleaning material on a portion of or all of a substrate prior to the application of a coating.

*Target HAP* are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

*Target HAP containing coating* means a spray-applied coating that contains any individual target HAP that is an Occupational Safety and Health Administration (OSHA)- defined carcinogen as specified in 29 CFR 1910.1200(d)(4) at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound. For the purpose of determining whether materials you use contain the target HAP compounds, you may rely on formulation data provided by the manufacturer or supplier, such as the material safety data sheet (MSDS), as long as it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA- defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other target HAP compounds.

*Transfer efficiency* means the amount of coating solids adhering to the object being coated divided by the total amount of coating solids sprayed, expressed as a percentage. Coating solids means the nonvolatile portion of the coating that makes up the dry film.

*Truck bed liner coating* means any coating, excluding color coats, labeled and formulated for application to a truck bed to protect it from surface abrasion.

*Mobile Component has used the Terms and definitions used in this subpart in developing this regulatory applicability analysis.*

## **Permit Conditions Review**

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

### **Facility-Wide Conditions**

Permit Conditions 2.15 and 2.16

*Since there are now heaters in multiple areas of the facility, this requirement was moved from the welding (now Fabrication) to the Facility-Wide section and the paint booth heater was added. After facility comment, an EI was calculated for all heaters operating for 8760 hours using AP-42 factors. Since these emissions are well below BRC for 8760 hours, the only requirements are the fuel burning IDAPA 58.01.01.677 and a requirement that the heaters combust natural gas only.*

### **Painting**

Permit Condition 3.2

*The control device description was updated to include the new paint booth, heaters, and new spray gun.*

Initial Permit Condition 3.3

*Emission limits were added for criteria pollutants emitted monthly from the coatings already in use at the facility along with the new coating, as demonstrated in the EI. The new coating hourly use is 62% of the EL for silica resulting in a daily limit for that TAP. The paint booth heater is regulated in the Facility-wide section.*

Initial Permit Conditions 3.5 and 3.6

*Monthly usage limits of each coating material ensure the current materials, as well as alternative coating materials meet the levels of the current application.*

Initial Permit Conditions 3.7 through 3.14

*These permit conditions are the DEQ approved approach to regulating coatings in such a way that IDAPA 58.01.01.585 and 586 TAPs screening levels (EL) or modeling concentrations (AAC or AACCO are not exceeded as demonstrated in the application emissions inventory. In this case, the applicant requested to keep their monthly usage for paints used under the old permit. This was accommodated by using monthly usage limits to meet monthly criteria pollutant emissions and a daily limit for the new coating to meet the silica TAP daily EL. Additionally, alternative coatings can be used after a demonstration that the alternative coating scenario also meets the regulations on a pound per day basis. Using MSDS data for any of the new coating materials, the analysis should use the higher values for ranges listed in section 3 – “Composition/information on ingredients” section of the MSDS only. Compounds listed in this section are the only TAPs or HAPs to be considered in the analysis of the alternative coating scenario.*

Permit Conditions 3.14 through 3.21

*The sole purpose of these permit conditions are to include the provisions of the National Emissions Standards for Hazardous Air Pollutants for Subpart HHHHHH– Stripping and Miscellaneous Surface Coating Operations at Area Sources. A detailed analysis of this regulation is provided in Appendix B.*

**Fabrication**

Permit Conditions 4.1 through 4.7

*Requested increases for current welding rod were updated and new welding rod types added. The toxic air pollutant Nickel limit was added because it was very near the emissions screening limit for the proposed mix of rods used.*

*The metal saw operations with water controls were determined in the initial permit to have negligible emissions potential.*

**PUBLIC REVIEW*****Public Comment Opportunity***

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

## APPENDIX A – EMISSIONS INVENTORIES

Mobile Component

Table 3-1: Heater Combustion Emissions

<b>Sources</b>	<b>No. of units</b>	<b>Input Duty</b>	
H1 Total Heaters	5	BTU/hr	MMBtu/hr
		250,000	1.2100 MMBtu/hr
	<b>Total</b>	<b>5</b>	<b>1.2100</b>
	<b>1.21 MMBtu/hr ±</b>	<b>1,020 MMBtu/MMsc</b>	<b>1.19E-03 MMscf/hr</b>
<b>Operating Assumptions:</b>		<b>24 hr/day</b>	
		<b>8,760 hr/yr<sup>3</sup></b>	<b>10.39 MMscf/yr</b>

Fuel Use:  
0.028 MMscf/day  
#### MMscf/yea

Criteria Air Pollutants	Emission Factor <sup>1</sup>	Emissions		Greenhouse Gas Emissions <sup>5</sup>	
	lb/MMscf	lb/hr	T/yr		
NO <sub>2</sub>	100	0.12	0.52	CO <sub>2</sub> = 0.054 kg/scf Natural Gas	
CO	84	0.10	0.44	CO <sub>2</sub> = 6.2E+02 Tons/year	
PM <sub>10</sub>	7.6	0.009	0.04	CH <sub>4</sub> = 0.00103 g/scf Natural Gas	
PM <sub>2.5</sub>	7.6	0.009	0.04	CH <sub>4</sub> = 1.2E-02 Tons/year	
SO <sub>2</sub>	0.6	7.1E-04	3.1E-03	N <sub>2</sub> O = 0.0001 g/scf Natural Gas	
VOC	5.5	6.5E-03	2.9E-02	N <sub>2</sub> O = 1.2E-03 Tons/year	
Lead	0.0005	5.9E-07	2.6E-06	Total CO <sub>2</sub> e = CO <sub>2</sub> + (CH <sub>4</sub> * 25) * (N <sub>2</sub> O * 298)	
		4.3E-04	lb/month	CO <sub>2</sub> e = <b>617.92</b>	<b>Tons/year</b>
<b>Total Criteria Emissions (ton/yr) = 1.03</b>					

Hazardous & Toxic Air Pollutants (HAP & TAP)	Emission Factor <sup>1</sup>	Emissions		Modeling Threshold	Modeling Required?
	lb/MMscf	lb/hr <sup>2</sup>	T/yr	TAP Screening Emission Level	
<b>PAH HAPs</b>					
2-Methylnaphthalene	2.40E-05	<b>2.85E-08</b>	1.2E-07	9.1E-05 lb/hr	No
3-Methylchloranthrene	1.80E-06	<b>2.14E-09</b>	9.4E-09	2.5E-06 lb/hr	No
Acenaphthene	1.80E-06	<b>2.14E-09</b>	9.4E-09	9.1E-05 lb/hr	No
Acenaphthylene	1.80E-06	<b>2.14E-09</b>	9.4E-09	9.1E-05 lb/hr	No
Anthracene	2.40E-06	<b>2.85E-09</b>	1.2E-08	9.1E-05 lb/hr	No
Benzo(a)anthracene	1.80E-06	<b>2.14E-09</b>	9.4E-09		See POM
Benzo(a)pyrene	1.20E-06	<b>1.42E-09</b>	6.2E-09	2.0E-06 lb/hr	See POM
Benzo(b)fluoranthene	1.80E-06	<b>2.14E-09</b>	9.4E-09		See POM
Benzo(g,h,i)perylene	1.20E-06	<b>1.42E-09</b>	6.2E-09	9.1E-05 lb/hr	No
Benzo(k)fluoranthene	1.80E-06	<b>2.14E-09</b>	9.4E-09		See POM
Chrysene	1.80E-06	<b>2.14E-09</b>	9.4E-09		See POM
Dibenzo(a,h)anthracene	1.20E-06	<b>1.42E-09</b>	6.2E-09		See POM
Fluoranthene	3.00E-06	<b>3.56E-09</b>	1.6E-08	9.1E-05 lb/hr	No
Fluorene	2.80E-06	<b>3.32E-09</b>	1.5E-08	9.1E-05 lb/hr	No
Indeno(1,2,3-cd)pyrene	1.80E-06	<b>2.14E-09</b>	9.4E-09		See POM
Naphthalene	6.10E-04	7.24E-07	3.2E-06	3.33 lb/hr	No
Naphthalene	6.10E-04	<b>7.24E-07</b>	3.2E-06	9.1E-05 lb/hr	No
Phenanthrene	1.70E-05	<b>2.02E-08</b>	8.8E-08	9.1E-05 lb/hr	No
Pyrene	5.00E-06	<b>5.93E-09</b>	2.6E-08	9.1E-05 lb/hr	No
PAH Max. total		<b>8.1E-07</b>	3.5E-06		
Polycyclic Org. Matter (POM, 7-PAH Group)		<b>1.35E-08</b>	<b>5.9E-08</b>	2.0E-06 lb/hr	No
<b>Non-PAH HAPs</b>					
Benzene	2.10E-03	<b>2.49E-06</b>	1.1E-05	8.0E-04 lb/hr	No
Dichlorobenzene	1.20E-03	1.42E-06	6.2E-06	20 lb/hr	No
Formaldehyde	7.50E-02	<b>8.90E-05</b>	3.9E-04	5.1E-04 lb/hr	No
Hexane	1.80E+00	2.14E-03	9.4E-03	12 lb/hr	No
Toluene	3.40E-03	4.03E-06	1.8E-05	25 lb/hr	No
<b>Non-HAP Organic Compounds</b>					
Pentane	2.60E+00	3.08E-03	1.4E-02	118 lb/hr	No
<b>Metal HAPs</b>					
Arsenic	2.00E-04	<b>2.37E-07</b>	1.0E-06	1.5E-06 lb/hr	No
Beryllium	1.20E-05	<b>1.42E-08</b>	6.2E-08	2.8E-05 lb/hr	No
Cadmium	1.10E-03	<b>1.30E-06</b>	5.7E-06	3.7E-06 lb/hr	No
Chromium	1.40E-03	1.66E-06	7.3E-06	0.033 lb/hr	No
Cobalt	8.40E-05	9.96E-08	4.4E-07	0.0033 lb/hr	No
Manganese	3.80E-04	4.51E-07	2.0E-06	0.067 lb/hr	No
Mercury	2.60E-04	3.08E-07	1.4E-06	0.003 lb/hr	No
Nickel	2.10E-03	<b>2.49E-06</b>	1.1E-05	2.7E-05 lb/hr	No
Selenium	2.40E-05	2.85E-08	1.2E-07	0.013 lb/hr	No
<b>Non-HAP Metals</b>					
Barium	4.40E-03	5.22E-06	2.3E-05	0.033 lb/hr	No
Copper	8.50E-04	1.01E-06	4.4E-06	0.013 lb/hr	No
Molybdenum	1.10E-03	1.30E-06	5.7E-06	0.333 lb/hr	No
Vanadium	2.30E-02	2.73E-06	1.2E-05	0.003 lb/hr	No
Zinc	2.90E-03	3.44E-05	1.5E-04	0.667 lb/hr	No
<b>Total HAP Emissions (ton/yr) = 0.010</b>					

Notes:

1. Emission factors taken from AP-42, Section 1.4 *Natural Gas Combustion* (7/98)
2. TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.
3. Booth Make-up Air heater is used only during cold weather, so actual on-line rating is significantly less.

Table 3-2 Welding Emissions

Welding Process/Electrode	TAP/HAP Metal	Al	Cr	Cr+6	Cu	Fe	Mg	Mn	Molyb	Ni	Silicon	Zn	Titanium	Be	Co	P
	CAS No. Restricted Daily Use (lbs.) <sup>1</sup>	7440-47-3 Al	7440-47-3 Cr	Cr+6	7440-50-8 Cu	7439-89-6 Fe	7439-96-5 Mg	7439-96-5 Mn	7439-98-7 Molyb	7440-21-3 Ni	7440-21-3 Silicon	7440-66-6 Zn	Titanium	7440-41-7 Be	7440-48-4 Co	P
Hobart, ER70S-6 <sup>1</sup> , Premier Arc 6	42.0	0.1%			5.00%	90.0%		10.00%	1.90%		5.00%		0.2%			
(Previously Permitted 9 lbs./week) Hobart, E6011 <sup>1</sup>	15.7					90.0%	1.00%	5.00%	1.0%	2.00%						
(Previously Permitted 9 lbs./week) Hobart, E7024-1 <sup>4</sup>	15.7					90.0%	1.00%	5.00%	1.0%	2.00%						
(Previously Permitted 157 lbs./day) Hobart Excel Arc 71TM <sup>5</sup> actual ~60 lbs./day	0.0	2.0%			1.00%	98.0%		5.00%	1.00%		4.00%	1.0%				
Avesta 308LS <sup>6</sup> need 10 lbs./week; @4.2 lbs./day = 21 lbs./week	4.00		25.00%			100.0%		2.50%		14.50%						
TAP		X	X	X	X	X	X	X	X	X	X	X		X	X	X
HAP			X	X				X		X				X	X	
SDAPCD w/ GMAW/SAW NASSCO fume correction <sup>2</sup>	PM	Al	Cr	Cr+6	Cu	Fe	Mg	Mn	Molyb	Ni	Silicon	Zn	Titanium	Be	Co	P
Table 12.19-1 and SDAPCD w/NASSCO fume correction <sup>3,4,5</sup>	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Table 12.19-2 <sup>3,4,5</sup>			X	X				X		X						X
SDAPCD Unspecified Process																
IDEO EL Dust (lbs./hr)	---	6.7E-01	3.3E-02	5.6E-07	6.7E-02	---	---	3.3E-01	6.7E-01	2.70E-05	6.7E-01	6.7E-01	---	2.80E-05	3.30E-03	7.00E-03
Restricted Uncontrolled PM and TAP Fume lbs/yr	2.6E+02	6.0E-02	5.7E-01	0.0E+00	3.0E+00	2.3E+02	1.9E+00	1.3E+01	3.1E+00	2.1E-01	6.9E+00	0.0E+00	1.2E-01	0.00E+00	0.0E+00	0.00E+00
Restricted Uncontrolled PM and TAP Fume lbs/day	9.98E-01	2.3E-04	2.2E-03	0.0E+00	1.1E-02	9.0E-01	7.5E-03	5.0E-02	1.2E-02	8.1E-04	2.6E-02	0.0E+00	4.6E-04	0.0E+00	0.0E+00	0.0E+00
Restricted Uncontrolled PM and TAP Hourly (24-hour average 585 TAPs, annual-average 586 TAPs) Fume Emissions lbs/hr	4.16E-02	9.56E-06	9.13E-05	0.0E+00	4.78E-04	3.75E-02	3.11E-04	2.08E-03	4.93E-04	2.42E-05	1.10E-03	0.00E+00	1.91E-05	0.00E+00	0.00E+00	0.00E+00
Restricted Controlled PM and TAP Fume lbs/yr	2.60E+02	5.97E-02	5.69E-01	0.00E+00	2.98E+00	2.34E-02	1.94E+00	1.30E+01	3.08E+00	2.12E-01	6.97E+00	0.00E+00	1.19E-01	0.00E+00	0.00E+00	0.00E+00
Restricted Controlled PM and TAP Fume lbs/day	9.98E-01	2.29E-04	2.19E-03	0.00E+00	1.15E-02	9.01E-01	7.47E-03	4.99E-02	1.18E-02	8.15E-04	2.64E-02	0.00E+00	4.59E-04	0.00E+00	0.00E+00	0.00E+00
Restricted Controlled PM and TAP Hourly (24-hour average 585 TAPs, annual-average 586 TAPs) Fume Emissions lbs/hr	4.16E-02	9.56E-06	9.13E-05	0.00E+00	4.78E-04	3.75E-02	3.11E-04	2.08E-03	4.93E-04	2.42E-05	1.10E-03	0.00E+00	1.91E-05	0.00E+00	0.00E+00	0.00E+00
IDEO EL Fume (lbs./hr)		---	---	---	1.3E-02	3.3E-01	6.7E-01	6.7E-02	---	---	---	3.330E-01	---	---	0.003	---
Uncontrolled PM2.5 <BRC 1 ton/yr	Yes															
Uncontrolled TAP <BRC 10% EL		Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	No	Yes	Yes	NA	Yes	Yes	Yes
Uncontrolled TAP <EL		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	89.5%	Yes	Yes	NA	Yes	Yes	Yes
Controlled TAP <EL		Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	89.5%	Yes	Yes	NA	Yes	Yes	Yes
Assume Production 8 hrs/day; 5 days/week																
Conservative Production Factor Increase	175%															
Fume Control Efficiency	0%															
<sup>1</sup> Johnathan Hobza estimated max weekly consumption, 50 lbs./week Hobart 6011, 50 lbs./week E7024, 246 lbs./week 71TM, 120 lb./week Premier Arc 6; 5 days/week;																
assume Production Increase Factor; assume annual production 52 weeks/year. These incremental increase amounts to be added to prior Permit Amounts in modified permit.																
<sup>2</sup> ER70S-6 not listed in AP-42, apply SDAPCD w/GMAW/SAW NASSCO fume correction																
<sup>3</sup> SAW E6011 AP-42 12.19	38.4	lbs/1000 lbs electrode	3.84% fume generation													
	Cr	Cr+6	Cobalt	Mn	Ni	Pb										
	0.0005%	ND	0.0001%	0.10%	0.0005%	ND										
<sup>4</sup> SAW E7024 AP-42 12.19	9.2	lbs/1000 lbs electrode	0.92% fume generation													
	Cr	Cr+6	Cobalt	Mn	Ni	Pb										
	0.0001%	ND	ND	0.06%	ND	ND										
<sup>5</sup> FAW 71TM AP-42 12.19	12.2	lbs/1000 lbs electrode	1.22% fume generation													
	Cr	Cr+6	Cobalt	Mn	Ni	Pb										
	0.0002%	ND	0.0001%	0.07%	0.0004%	ND										
<sup>6</sup> GMAW 308L AP-42 12.19	5.4	lbs/1000 lbs electrode	0.54% fume generation													
	Cr	Cr+6	Cobalt	Mn	Ni	Pb										
	0.0524%	ND	0.0001%	0.03%	0.0184%	ND										

Table 4-1: Coating Analysis

Max. PTE Unrestricted Daily Use (gal/day)	Max. PTE Unrestricted Annual Use (gal/year)	Maker	Coating Material (see Notes)	Density	Solids	VOC (non-exempt)	Propyl alcohol 71-23-8	ethanol 64-17-6	naphthalene 91-20-3	trimethyl benzene 96-63-6 25661-13-7	1-methoxy-2-propanol acetate 106-86-6	Phenol 108-906-2	methyl n-amy ketone 110-43-0	2-Butoxyethanol 111-78-2	butyl acetate 123-86-4	hexa-methylene diisocyanate monomer 822-06-0	kaolin 1333-68-7	carbon black 1333-86-4	Silica 14808-60-7	naphtha (petroleum) light aromatic 84742-96-4 84742-84-6	
																					Weight Percentage Content Data
36	3100	Specialty Adhesives and Coating	2016	10.50	35.00%	5.00%								1.0%				15.0%		3.0%	
		Misc. Spray cans	Misc. Spray cans																		
Component Characteristics																					
if volatile, enter "1" ***																					
Hourly Spray Calculations (lb/hr)  (Based on 24-hr averaging period, see sample calc below)	Maker	Coating Material	Density	Solids	VOC (non-exempt)	Propyl alcohol 71-23-8	ethanol 64-17-6	naphthalene 91-20-3	trimethyl benzene 96-63-6 25661-13-7	1-methoxy-2-propanol acetate 106-86-6	Phenol 108-906-2	methyl n-amy ketone 110-43-0	2-Butoxyethanol 111-78-2	butyl acetate 123-86-4	HD Monomer 822-06-0	kaolin 1333-68-7	carbon black 1333-86-4	Silica 14808-60-7	naphtha (petroleum) light aromatic		
	Specialty Adhesives and Coating		2016	10.50	5.36	0.77	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.15313	0.00000	0.00000	2.29688	0.00000	0.45938	0.00000	
	Misc. Spray cans	Misc. Spray cans																			
	0																				
	0																				
		Spray Total (lb/hr)		5.358	0.766	0.0000	0.000	0.000	0.0000	0.000	0.00000	0.000	0.153	0.000	0.00000	2.29688	0.00000	0.45938	0.00000		
Annual Spray Calculations (ton/yr)  (See sample calc below)	Maker	Coating Material	Density	Solids	VOC (non-exempt)	Propyl alcohol 71-23-8	ethanol 64-17-6	naphthalene 91-20-3	trimethyl benzene 96-63-6 25661-13-7	1-methoxy-2-propanol acetate 106-86-6	Phenol 108-906-2	methyl n-amy ketone 110-43-0	2-Butoxyethanol 111-78-2	butyl acetate 123-86-4	HD Monomer 822-06-0	kaolin 1333-68-7	carbon black 1333-86-4	Silica 14808-60-7	naphtha (petroleum) light aromatic		
	Specialty Adhesives and Coating		2016	10.50	16.72	2.38	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.478	0.000	0.000	7.166	0.000	1.433	0.000	
	Misc. Spray cans	Misc. Spray cans																			
	0																				
	0																				
		Spray Total (ton/yr)		16.72	2.38	0.0000	0.000	0.000	0.000	0.000	0.00000	0.00	0.48	0.00	0.00000	7.16625	0.00000	1.43325	0.00000		

Mobile Component

Table 4-2: Coating Emissions

Toxic Air Pollutants	CAS	Restricted Maximum Spray Rate <sup>1</sup> (lb/hr)	Spray Retention Rate <sup>2</sup> (%)	Restricted Potential to Emit (lb/hr)	Paint Filter Efficiency <sup>3</sup> (%)	Controlled Emission Rate (lb/hr)
2-Butoxyethanol	111-76-2	0.153	0%	0.153	0%	0.153
kaolin	1333-58-7	2.297	70%	0.6891	97%	0.021
silica	14808-60-7	0.4594	70%	0.1378	97%	0.0041

Criteria Air Pollutants	Maximum Spray Rate <sup>1</sup>		Spray Retention Rate <sup>2</sup>	Potential to Emit		Paint Filter Efficiency <sup>3</sup>	Controlled Emissions	
	lb/hr	ton/yr	%	lb/hr	ton/yr	%	lb/hr	ton/yr
PM <sub>10</sub>	5.36	16.72	70%	1.61	5.02	97.0%	0.048	0.15
PM <sub>2.5</sub>	5.36	16.72	70%	1.61	5.02	97.0%	0.048	0.15
VOC	0.77	2.39	0%	0.77	2.39	0%	0.77	2.39

Hazardous Air Pollutants (HAP)	CAS	Maximum Spray Rate <sup>1</sup> (ton/yr)	Spray Retention Rate (%)	Potential to Emit (ton/yr)

Notes:

1. The maximum hourly or annual Spray Total of the coatings.
2. Sray gun Graco FinishPro II 395 PC or equivalent; manufacturer spray retention efficiency 70-80%. Non-volatile emissions are calculated using a coating retention

**Tables 5-1a to 5-1c:  
Facility-Wide Unrestricted Criteria Regulated Pollutant Emissions**

**Table 5-1a: Pre-Project Potential to Emit**

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead	Greenhouse Gases CO <sub>2</sub> e
	tons/yr							
Heaters	0.03	0.03	1.99E-04	0.39	0.16	0.02	0	495.0
Welding	0.39	0.39	---	---	---	---	---	---
Grinding-welds	0.14	0.14	---	---	---	---	---	---
Grinding-grinding wheels	0.16	0.16	---	---	---	---	---	---
Paint Booths	2.20	2.20	---	---	---	6.25	---	---
<b>Total =</b>	<b>2.92</b>	<b>2.92</b>	<b>0.00</b>	<b>0.39</b>	<b>0.16</b>	<b>6.27</b>	<b>0</b>	<b>495.0</b>

**Table 5-1b: Post-Project Potential to Emit (based on maximum continuous operations)**

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead	Greenhouse Gases CO <sub>2</sub> e
	tons/yr							
Heaters	0.07	0.07	3.32E-03	0.91	0.60	0.05	0	1112.92
Welding	0.94	0.94	---	---	---	---	---	---
Grinding-welds	0.14	0.14	---	---	---	---	---	---
Grinding-grinding wheels	0.16	0.16	---	---	---	---	---	---
Paint Booths	23.33	23.33	---	---	---	16.31	---	---
<b>Total =</b>	<b>24.63</b>	<b>24.63</b>	<b>0.00</b>	<b>0.91</b>	<b>0.60</b>	<b>16.36</b>	<b>0</b>	<b>1112.92</b>

**Table 5-1c: Changes in Potential to Emit (based on maximum continuous operations)**

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead	Greenhouse Gases CO <sub>2</sub> e
	tons/yr							
Heaters	0.04	0.04	3.12E-03	0.52	0.44	0.03	0	617.92
Welding	0.55	0.55	---	---	---	---	---	---
Grinding-welds	0.00	0.00	---	---	---	---	---	---
Grinding-grinding wheels	0.00	0.00	---	---	---	---	---	---
Paint Booths	21.13	21.13	---	---	---	10.06	---	---

**Tables 5-2a to 5-2c:  
Facility-Wide Restricted Criteria Regulated Pollutant Emissions**

**Table 5-2a: Pre-Project Potential to Emit** (based on existing permit conditions)

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead
	tons/yr						
Heaters	0.003	0.003	1.99E-04	0.031	0.01	0.0018	0
Welding	0.11	0.11	---	---	---	---	---
Grinding-welds	0.04	0.04	---	---	---	---	---
Grinding-grinding wheels	0.05	0.05	---	---	---	---	---
Paint Booths	0.01	0.01	---	---	---	1.78	---
<b>Total =</b>	<b>0.21</b>	<b>0.21</b>	<b>0.00</b>	<b>0.03</b>	<b>0.01</b>	<b>1.78</b>	<b>0</b>

**Table 5-2b: Post-Project Potential to Emit** (based on requested permit conditions)

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead
	tons/yr						
Heaters	0.04	0.04	3.32E-03	0.55	0.45	0.03	0
Welding	0.24	0.24	---	---	---	---	---
Grinding-welds	0.04	0.04	---	---	---	---	---
Grinding-grinding wheels	0.05	0.05	---	---	---	---	---
Paint Booths	0.16	0.16	---	---	---	4.17	---
<b>Total =</b>	<b>0.53</b>	<b>0.53</b>	<b>0.00</b>	<b>0.55</b>	<b>0.45</b>	<b>4.20</b>	<b>0</b>

**Table 5-2c: Changes in Potential to Emit**

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead
	tons/yr						
Heaters	0.04	0.04	3.12E-03	0.52	0.44	0.03	0
Welding	0.13	0.13	---	---	---	---	---
Grinding-welds	0.00	0.00	---	---	---	---	---
Grinding-grinding wheels	0.00	0.00	---	---	---	---	---
Paint Booths	0.15	0.15	---	---	---	2.39	---
<b>Total =</b>	<b>0.32</b>	<b>0.32</b>	<b>0.00</b>	<b>0.52</b>	<b>0.44</b>	<b>2.42</b>	<b>0</b>

**Mobile Component**

**Table 5-3 Criteria Pollutant Restricted Controlled Emissions**

Max Restricted Controlled PTE Criteria Air Pollutants	Pre Project Estimated Emission Rate	Post Project Estimated Emission Rate	10% Significant Emission Rate	BRC Exemption
	(T/yr)	(T/yr)	(T/yr)	Post Project < 10% Sig. Rate? (Y/N)
NO <sub>2</sub>	3.10E-02	5.82E-01	4	Yes
CO	1.00E-02	4.46E-01	10	Yes
PM	2.10E-01	7.40E-01	2.5	Yes
PM <sub>10</sub>	2.10E-01	7.40E-01	1.5	Yes
PM <sub>2.5</sub>	2.10E-01	7.40E-01	1	Yes
SO <sub>x</sub>	1.99E-04	3.52E-03	4	Yes
VOC	1.78E+00	5.98E+00	4	No
Lead		2.60E-06	0.06	Yes

**Table 5-4:  
Facility-Wide Toxic Air Pollutant Emissions**

Non-Carcinogenic Toxic Air Pollutant (24 hr Average)	Restricted Controlled Hourly Emissions		Emission Change (lb/hr)	Screening Emission Level (lb/hr)	Emission Change Exceeds TAP EL?	% TAP EL
	Pre-Project <sup>1</sup> (lb/hr)	Post Project <sup>2</sup> (lb/hr)				
Aluminum	2.26E-03	2.26E-03	0.00E+00	3.30E-02	No	0%
Aluminum oxide	8.79E-02	8.79E-02	9.56E-06	3.30E-02	No	0%
Barium	1.38E-06	6.60E-06	5.22E-06	3.30E-02	No	0%
2-Butoxyethanol	0.00E+00	1.53E-01	1.53E-01	8.00E+00	No	2%
Calcium Carbonate	4.29E-04	4.29E-04	0.00E+00	3.30E-02	No	0%
Carbon Black	4.86E-02	4.86E-02	0.00E+00	3.30E-02	No	0%
Chromium	2.26E-03	2.35E-03	9.29E-05	3.30E-02	No	0%
Cobalt	7.52E-04	7.52E-04	9.96E-08	3.30E-03	No	0%
Copper	1.50E-03	1.98E-03	4.79E-04	6.70E-02	No	1%
Dichlorobenzene	0.00E+00	1.42E-06	1.42E-06	2.00E+01	No	0%
Ethylbenzene	1.53E+00	1.53E+00	0.00E+00	3.33E-01	No	0%
Hexane	5.65E-04	2.70E-03	2.14E-03	3.33E-01	No	1%
Iron Oxide Fume	1.07E-02	4.82E-02	3.75E-02	3.33E-01	No	11%
Kaolin	0.00E+00	2.07E-02	2.07E-02	1.33E-01	No	16%
Magnesium Oxide	1.50E-03	1.81E-03	3.11E-04	6.70E-02	No	0%
Manganese Dust and Compounds	0.00E+00	4.51E-07	4.51E-07	3.33E-01	No	0%
Manganese Fume	4.66E-03	6.74E-03	2.08E-03	6.70E-02	No	3%
Mercury	0.00E+00	3.08E-07	3.08E-07	3.00E-03	No	0%
1-methoxy-2-propanol acetate	1.13E+00	1.13E+00	0.00E+00	3.33E-01	No	0%
Molybdenum	0.00E+00	4.94E-04	4.94E-04	3.33E-01	No	0%
Naphthalene	1.91E-07	9.15E-07	7.24E-07	3.33E+00	No	0%
Selenium	7.53E-09	3.60E-08	2.85E-08	1.30E-02	No	0%
Silica - quartz	3.51E-03	9.82E-03	6.31E-03	6.70E-03	No	94%
Silicon	3.18E-03	4.28E-03	1.10E-03	6.67E-01	No	0%
Silicon Dioxide	0.00E+00	0.00E+00	0.00E+00	6.67E-01	No	0.0%
Toluene	9.11E+00	9.11E+00	0.00E+00	2.50E+01	No	0%
Xylene	4.02E-01	4.02E-01	0.00E+00	2.90E+01	No	0%
Zinc Metal	9.10E-06	4.35E-05	3.44E-05	6.67E-01	No	0%
Zinc Oxide	8.05E-02	8.05E-02	0.00E+00	6.67E-01	No	0%
Zirconium	1.20E-02	1.20E-02	9.56E-06	3.33E-01	No	0%
Carcinogenic Toxic Air Pollutant (Annual Average)	Restricted Controlled Hourly Emissions		Emission Change (lb/hr)	Screening Emission Level (lb/hr)	Emission Change Exceeds TAP EL?	% TAP EL
	Pre-Project (lb/hr)	Post Project (lb/hr)				
Arsenic	5.36E-08	2.9E-07	2.4E-07	1.5E-06	No	16%
Benzene	5.63E-07	3.1E-06	2.5E-06	8.0E-04	No	0%
Beryllium	3.22E-09	1.7E-08	1.4E-08	2.8E-05	No	0%
Cadmium	3.22E-09	1.3E-06	1.3E-06	3.7E-06	No	35%
Chromium+6	0.00E+00	0.0E+00	0.0E+00	5.6E-07	No	0%
Formaldehyde	2.01E-05	1.1E-04	8.9E-05	5.1E-04	No	17%
3-Methylchloranthene	4.83E-01	4.8E-01	2.1E-09	2.5E-06	No	0%
Nickel	1.50E-03	1.527E-03	2.67E-05	2.7E-05	No	99%
Polyaromatic Hydrocarbon (Max)	0.00E+00	8.1E-07	8.1E-07	9.1E-05	No	1%
Polycyclic Organics: 7-PAH Group	3.06E-09	1.7E-08	1.4E-08	2.0E-06	No	1%

Mobile Component

**Table 5-5:  
Facility-Wide Hazardous Air Pollutant Emissions**

Hazardous Air Pollutant	Unrestricted Uncontrolled Potential to Emit			Restricted
	Pre-Project <sup>1</sup> (tons/yr.)	Post Project <sup>2</sup> (tons/yr.)	Uncontrolled Emission Change (tons/yr.)	Pre-Project <sup>1</sup> (tons/yr.)
2-methylnaphthalene	9.89E-08	2.2E-07	1.25E-07	9.89E-08
3-methylchloranthene	7.42E-09	1.7E-08	9.35E-09	7.42E-09
2-Dimethylbenz(a)anthracene	6.60E-08	6.6E-08	0.00E+00	6.60E-08
Acenaphthene	7.42E-09	1.7E-08	9.35E-09	7.42E-09
Acenaphthylene	7.42E-03	7.4E-03	9.35E-09	7.42E-03
Anthracene	9.89E-09	2.2E-08	1.25E-08	9.89E-09
Arsenic	8.24E-07	1.9E-06	1.04E-06	8.24E-07
Benzene	8.66E-06	2.0E-05	1.09E-05	8.66E-06
Benzo(g,h,i)perylene	4.95E-08	5.6E-08	6.24E-09	4.95E-08
Beryllium	9.89E-08	1.6E-07	6.24E-08	9.89E-08
Cadmium	4.53E-06	1.0E-05	5.72E-06	4.53E-06
Chromium	5.77E-06	1.2E-03	1.21E-03	5.77E-06
Cobalt	9.63E-04	9.6E-04	4.36E-07	9.63E-04
Dichlorobenzene	4.95E-06	1.1E-05	6.24E-06	4.95E-06
Ethylbenzene	7.72E-01	7.7E-01	0.00E+00	7.72E-01
Fluoranthene	1.24E-08	2.8E-08	1.56E-08	1.24E-08
Fluorene	1.15E-08	2.6E-08	1.45E-08	1.15E-08
Formaldehyde	3.09E-04	7.0E-04	3.90E-04	3.09E-04
Hexane	7.42E-03	1.7E-02	9.35E-03	7.42E-03
HMDI	0.00E+00	0.0E+00	0.00E+00	0.00E+00
Lead	0.00E+00	2.6E-06	2.60E-06	0.00E+00
Manganese	1.07E-06	2.7E-02	2.73E-02	1.07E-06
Mercury	1.07E-06	2.4E-06	1.35E-06	1.07E-06
Molybdenum	3.30E-03	9.8E-03	6.48E-03	3.30E-03
Naphthalene	2.51E-06	5.7E-06	3.17E-06	2.51E-06
Nickel	6.60E-03	7.1E-03	4.57E-04	6.60E-03
Phenanthrene	7.01E-08	1.6E-07	8.83E-08	7.01E-08
Polycyclic Organic Matter (PAH MAX.)	4.70E-08	3.6E-06	3.54E-06	4.70E-08
Pyrene	2.06E-08	4.7E-08	2.60E-08	2.06E-08
Selenium	9.89E-08	2.2E-07	1.25E-07	9.89E-08
Toluene	2.03E-01	2.0E-01	1.77E-05	2.03E-01
Xylene	4.59E+00	4.6E+00	0.00E+00	4.59E+00
<b>TOTAL =</b>	<b>5.59E+00</b>	<b>5.64E+00</b>	<b>4.53E-02</b>	<b>5.59E+00</b>

## APPENDIX B – FACILITY DRAFT COMMENTS

## **The following comments were received from the facility on July 9&11, 2018:**

Facility draft comments were provided by the consultant on the margin of the draft permit. Some comments were repeated in a second version from the owner himself. Most of the comments provided by the owner were repeats of the consultants, but where they differ the DEQ response is included.

Facility comments in general are in five categories and each category will be answered at one time.

**Facility Comment:** typos and tables: Comments A1, A2, A4, and A11 were regarding typos in Tables 1.1, 3.1, and 4.1. The owner found typos in descriptive permit conditions 3.1 and 4.1, as well as other descriptions in Table 3.1.

**DEQ Response:** The suggested corrections are placed in the permit.

**Facility Comment:** Combustion units tracking: Comment A3 requests that combustion of natural gas tracking and recordkeeping be removed. This was also repeated by the owner.

**DEQ Response:** Since the max. uncontrolled PTE 10.4 MMscf/yr. fuel use limits and record keeping requirements are unnecessary to assure compliance. IDAPA 58.01.01.677 states in part "*A person shall not discharge into the atmosphere from any fuel burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than ten (10) million BTU per hour ...*". Each unit in the emissions inventory was presented as 1.21 MM Btu/hr total and since the units are less than 10 MM Btu/hr for each unit, this rule will need to be included in the permit with the natural gas limits in the facility wide section for combusting natural gas exclusively to ensure compliance. However, the applicant's request to remove the tracking and recordkeeping for this permit condition is valid, as there is none required for compliance of this rule.

**Facility Comment:** Paint limits: Comments A5-A10 are regarding the boiler plate permit language used to craft this section. The owner repeated some of the comments.

**DEQ Response:** This boiler plate method has been developed over time with the cooperation of several applicant's, regional inspectors, and permit writers to ensure that TAPs and criteria pollutant levels are maintained in the event that coatings need to be changed. This is offered to aid the permittee by not requiring a permit modification and also to lessen the work for DEQ. However, even if the alternative boiler plate method were to be removed from this permit, there would still be daily and annual usage limits due to the TAP silica. This TAP is present in the inventories at 61% of the hourly screening value. The solution suggested by the facility is to have a daily limit for the new paint and retain the monthly limits for the existing paints. This solution is acceptable to DEQ. Annual usage limits were removed because the source emissions are far below major source thresholds.

**Facility Comment:** Welding rod usage. Comments A12-A14

**DEQ Response:** The consultant was mistaken about the Voestapine Bohler Welding Avesta 308L welding rod. The limits and requirements remain the same. Regarding the monitoring time, Nickel is presented in the EI at 99% of the emission screening level, thus requiring the daily limit for Element 71T1M rod. The owner aptly pointed out the correct name for the Jetrod welding rod and that there is not an actual machining room and these two errors were corrected. He also suggested changing the usage from 21 lb/week to 20 lb/week for the Avesta 308L rod; therefore, this limit has been changed.

**Facility Comment:** Grinding wheel usage. Comments A15-A17

**DEQ Response:** These limits were taken from the original usage reported in the initial permit application. It was agreed to change the wording and table back to the original permit language due to they are currently tracking the grinding materials by weight.

**Facility Comment:** The consultant brought to light an error in the original application. The original EI had two new heaters rated at 0.16 MMBtu/hr each, but there was only one at 0.25 MMBtu/hr. This changed values throughout the SOB, increasing some emissions by negligible amounts.

**DEQ Response:** The values have been updated in the SOB.

**APPENDIX C – PROCESSING FEE**

## PTC Processing Fee Calculation Worksheet

**Instructions:**

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

**Company:** Mobile Component, Inc.  
**Address:** 450 E. Amity Road  
**City:** Boise  
**State:** ID  
**Zip Code:** 83716  
**Facility Contact:** Jonathan Hobza  
**Title:** President  
**AIRS No.:** 001-00296

**N** Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N

**Y** Did this permit require engineering analysis? Y/N

**N** Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

<b>Emissions Inventory</b>			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO <sub>x</sub>	0.6	0	0.6
SO <sub>2</sub>	0.0	0	0.0
CO	0.5	0	0.5
PM10	0.3	0	0.3
VOC	2.4	0	2.4
TAPS/HAPS	0.0	0	0.0
<b>Total:</b>	<b>0.0</b>	<b>0</b>	<b>3.9</b>
Fee Due	<b>\$ 2,500.00</b>		

Comments: