

Statement of Basis

Final

**Charmac Trailers
Facility Name
Twin Falls, Idaho
Facility ID No. 083-00068
Permit to Construct No. P-2009.0095**

**January 6, 2010
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Permit Writer**



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.

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE..... 3

FACILITY INFORMATION 5

 Description 5

 Permitting History 6

 Application Scope 6

 Application Chronology 6

TECHNICAL ANALYSIS..... 7

 Emissions Units and Control Devices 7

 Emissions Inventories 8

 Ambient Air Quality Impact Analyses 8

REGULATORY ANALYSIS 8

 Attainment Designation (40 CFR 81.313) 8

 Permit to Construct (IDAPA 58.01.01.201)..... 8

 Tier II Operating Permit (IDAPA 58.01.01.401) 8

 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)..... 9

 PSD Classification (40 CFR 52.21) 10

 NSPS Applicability (40 CFR 60) 10

 NESHAP Applicability (40 CFR 61)..... 11

 MACT Applicability (40 CFR 63)..... 11

 CAM Applicability (40 CFR 64) 14

 Permit Conditions Review 14

PUBLIC REVIEW 16

 Public Comment Opportunity 16

APPENDIX A – PERMIT FEES

APPENDIX B – FACILITY DRAFT COMMENTS

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations for non-carcinogens
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
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
CBP	concrete batch plant
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
FEC	Facility Emissions Cap
gpm	gallons per minute
gph	gallons per hour
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HMA	hot mix asphalt
hp	horsepower
hr/yr	hours per year
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance
PAH	polyaromatic hydrocarbons
PC	permit condition
PCB	polychlorinated biphenyl

PERF	Portable Equipment Relocation Form
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
RAP	recycled asphalt pavement
RFO	reprocessed fuel oil
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SCL	significant contribution limits
SIC	Standard Industrial Classification
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 ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per consecutive 12-calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TEQ	toxicity equivalent
T-RACT	Toxic Air Pollutant Reasonably Available Control Technology
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compounds
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

Charmac Trailers (Charmac) is a recreational trailer manufacturing company located at 452 South Park Avenue West in Twin Falls, Idaho. Charmac manufactures trailers used for recreational purposes, as well as for cargo and livestock transport. All trailers are manufactured from the ground up using steel and aluminum frames welded on-site using a jig and welding platform. All aspects of the manufacturing process are performed at this location.

Charmac manufactures seven different specialized types of trailers, each with its own specific manufacturing and production requirements. All trailers go through the following general steps in the manufacturing process:

- Frame alignment, welding, and construction,
- Frame washing and paint preparation,
- Primer and topcoat paint application to trailer frames,
- External sheeting and coatings,
- Internal components, flooring, and inspection, and
- Final wash

Paint Booth Operations

Charmac operates two paint booths. The booths are used to apply primer and topcoat paint to the trailers. Each paint booth is operated approximately five hours per day.

Paint Booth No. 1:

Paint booth No. 1 has been in operation since 1979. This is the original booth used for painting operations by Charmac. This booth operates for approximately five hours per day and is used for the application of primer and topcoat paint. It uses a pressure pump system with a high-volume, low-pressure (HVLP) spray gun with a transfer efficiency of 65%. The paint booth building is approximately 53 feet long, 24 feet wide, and 16 feet high. This paint booth has one exhaust stack.

Paint Booth No. 2:

Paint booth No. 2 has been in operation since 1986. This booth was added to accommodate the facility's increased production needs. This booth operates approximately five hours per day for the application of primer and topcoat paint. It also uses a pressured pump system with an HVLP spray gun with a transfer efficiency of 65%. The paint booth building is approximately 60 feet long, 36 feet wide, and 25 feet high. The booth, which is located inside the building, is approximately 56 feet long, 16 feet wide, and 11 feet high. The paint booth has two identical exhaust stacks.

Natural Gas-Fired Space Heaters

Natural gas-fired heaters were installed at Charmac between June and September 2002 to replace wood stoves previously used to heat the facility during winter months. Replacement of the wood stoves was required by a Consent Order entered into by DEQ and Charmac on January 8, 1998. The number of heaters and the heat input capacities of the heaters are as follows:

- Two heaters with a heat input capacity of 300,000 Btu/hr each,
- One heater with a heat input capacity of 125,000 Btu/hr,
- Thirteen heaters with a heat input capacity of 80,000 Btu/hr each,
- Ten heaters with a heat input capacity of 75,000 Btu/hr each,

- Two heaters with a heat input capacity of 90,000 Btu/hr each, and
- Four heaters with a heat input capacity of 100,000 Btu/hr each.

The total heat input from all 32 natural gas-fired space heaters is 3.095 MMBtu/hr. Particulate matter with an aerodynamic diameter less than or equal to nominal 10 micrometers (PM₁₀) emissions from the natural gas-fired heaters were included in the air dispersion modeling for permit T2-020412.

Welding Operations

Welding operations are a component of the manufacturing operations at Charmac. Welding processes are used to connect tubular steel and aluminum together to form the trailer frames. Charmac uses a welding process identified as gas metal arc welding. Welding of steel tubing uses a specific steel core wire (electrode) and rod material. Aluminum welding uses a specific aluminum welding wire (electrode) and rod material. Particulate matter with an aerodynamic diameter less than or equal to nominal 10 micrometers (PM₁₀) emissions from the welding process were also included in the air dispersion modeling for permit T2-020412.

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).

February 20, 2004 T2-020412, Initial Tier II permit for an existing facility, Permit status (A, but will become S upon issuance of this permit)

Application Scope

This PTC is a modification of an existing T2 permit. The permittee also requested to change the permit type from a Permit to Construct and Tier II Operating Permit into a single PTC. See the current Tier I permit statement of basis for the permitting history.

The applicant has proposed to make the following modifications to the existing permit as a result of this project:

- The facility no longer wants to be limited to 27.3 gallons per day and 9,965 gallons per year of “white primer, black primer, reducer, and catalyst” (see current permit condition 3.4). Instead, the facility would rather have additional monitoring and recordkeeping requirements to demonstrate compliance with the current PM₁₀, VOC and HAPs emissions limits (see current permit Appendix A and B respectively).

Application Chronology

July 15, 2009	DEQ received an application and an application fee.
August 11, 2009	DEQ determined that the application was incomplete.
September 3, 2009	DEQ received supplemental information from the applicant.
October 6, 2009	DEQ determined that the application was complete.
November 25, 2009	DEQ made available the draft permit and statement of basis for peer and Regional Office review.
December 1, 2009	DEQ made available the draft permit and statement of basis for applicant review.
December 23, 2009	DEQ received a permit processing fee.
January 6, 2010	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Devices

Table 1 EMISSIONS UNIT AND CONTROL DEVICE INFORMATION

ID No.	Source Description	Emissions Controls	Emissions Discharge Point ID No. and/or Description
Paint Booth No. 1	<u>Paint Booth No.1:</u> Paint booth No. 1 has been in operation since 1979 and is used to apply primer (primer paint, catalyst, and reducer) and a topcoat coatings to trailer frames. This booth has one stack.	<u>Paint Booth No.1:</u> Manufacturer: Superior Glass Fibers, Inc. Type: Glass Fiber Paint Arrestor P Model: TYB 26-300-22-00 Filters PM ₁₀ Control Efficiency: 96%	<u>Vent C:</u> Exit height: 16 ft (4.88 m) Exit diameter: 4.5 ft (1.38 m) Exit flow rate: 5,295 cfm Exit temperature: 67.7 °F (293 K)
Paint Booth No. 2	<u>Paint Booth No.2:</u> Paint booth No. 2 has been in operation since 1986 to apply primer (primer paint, catalyst, and reducer) and a topcoat coating to trailer frames. This booth has two identical stacks.	<u>Paint Booth No.2:</u> Manufacturer: Superior Glass Fibers, Inc. Type: Glass Fiber Paint Arrestor P Model: TYB 26-300-22-C-4-00 Filters PM ₁₀ Control Efficiency: 96%	<u>Vents A and B (two identical stacks):</u> Exit heights: 15 ft (4.57 m) Exit diameters: 3.9 ft (1.19 m) Exit flow rates: 5,295 cfm Exit temperatures: 67.7 °F (293 K)
Space Heaters	<u>Space Heaters:</u> Two heaters with a rated heat input of 300,000 Btu/hr One heater with a rated heat input of 125,000 Btu/hr Thirteen heaters with a rated heat input of 80,000 Btu/hr Ten heaters with a rated heat input of 75,000 Btu/hr Two heaters with a rated heat input of 90,000 Btu/hr Four heaters with a rated heat input of 100,000 Btu/hr	N/A	32 space heater outlets
Welding operation	Welding emissions	N/A	Fugitive

Emissions Inventories

This facility is an existing minor source and there is no proposed change in the potential to emit as a result of this project. Therefore, uncontrolled emissions do not be calculated for this project. In addition, since there is no proposed change in emissions, the pre- and post project potential to emit are the same and the previous emissions inventory from permit T-020412 will be used for this project as presented as follows in Table 2.

Table 2 PRE- AND POST PROJECT EMISSIONS ESTIMATES OF CRITERIA POLLUTANTS – POTENTIAL TO EMIT

Emissions Unit	PM ₁₀ ^c		SO ₂		NO _x		CO		VOC		HAPs	
	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	lb/hr	T/yr
Point Sources												
Paint Booth No.1 and No. 2 combined	1.24	5.43	N/A	N/A	N/A	N/A	N/A	N/A	7.325	32.1	N/A	16.5
Space Heaters	N/A	0.1	N/A	0.008	N/A	1.25	N/A	0.53	N/A	0.073	N/A	0.025
Welding Operations	N/A	0.027	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0.001
Pre-Project Totals	1.24	5.56	0.00	0.01	0.00	1.25	0.00	0.53	7.33	32.17	0.00	16.53

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
- b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.
- c) Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.81.

There was not a TAPs emissions analysis provided with the application for this project. This was done because the facility wanted flexibility in using different paints at the facility than was originally allowed in the current permit. Therefore, the permit will require a TAPs analysis per IDAPA 58.01.01.585 and 586 (see Regulatory Analysis – Permit Conditions Review Section).

Ambient Air Quality Impact Analyses

As discussed previously in the Application Scope Section there was no increase in emissions proposed for this project. Therefore, per the State of Idaho Air Quality Modeling Guideline¹ an ambient air quality impact analysis was not required to be performed for this project.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Twin Falls County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The facility has requested that their current Tier II permit be modified. As mentioned previously in the Facility Information – Application Scope Section it was determined that this modification of the facility’s existing T2 permit would be converted to a PTC.

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 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. In addition, as mentioned previously the Facility Information - Application Scope it was determined that this modification of the facility’s existing T2 permit would be converted to a PTC

¹ Criteria pollutant thresholds in Table 1, State of Idaho Air Quality Modeling Guideline, Doc ID AQ-011, rev. 1, December 31, 2002.

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

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

IDAPA 58.01.01.006.118 defines a Tier I source as “Any source located at a major facility as defined in Section 008.” IDAPA 58.01.01.008.10 defines a Major Facility as either:

- For HAPS a facility with the potential to emit ten (10) tons per year (tpy) or more of any hazardous air pollutant, other than radionuclides, or
- The facility emits or has the potential to emit twenty-five (25) tpy or more of any combination of any hazardous air pollutants, other than radionuclides.

or, for non-attainment areas:

- The facility is located in a “serious” particulate matter (PM₁₀) nonattainment area and the facility has the potential to emit seventy (70) tpy or more of PM₁₀, or
- The facility is located in a “serious” carbon monoxide nonattainment area in which stationary sources are significant contributors to carbon monoxide levels and the facility has the potential to emit fifty (50) tpy or more of carbon monoxide, or
- The facility is located in an ozone transport region established pursuant to 42 U.S.C. Section 7511c and the facility has the potential to emit fifty (50) tpy or more of volatile organic compounds, or
- The facility is located in an ozone nonattainment area and, depending upon the classification of the nonattainment area, the facility has the potential to emit the following amounts of volatile organic compounds or oxides of nitrogen; provided that oxides of nitrogen shall not be included if the facility has been identified in accordance with 42 U.S.C. Section 7411a(f)(1) or (2) if the area is “marginal” or “moderate,” one hundred (100) tpy or more, if the area is “serious,” fifty (50) tpy or more, if the area is “severe,” twenty-five (25) tpy or more, and if the area is “extreme,” ten (10) tpy or more.
- The facility emits or has the potential to emit one hundred (100) tons per year or more of any regulated air pollutant. The fugitive emissions shall not be considered in determining whether the facility is major unless the facility is a “Designated Facility”:

The following table compares the post-project facility-wide annual controlled emission rate for all HAPs emitted by the source to the HAPS Major Source thresholds in order to determine if the facility is a HAPS Major Source.

Table 3 PTE FOR HAPs POLLUTANTS COMPARED TO THE HAPs MAJOR SOURCE THRESHOLDS

HAPS Pollutants	PTE (T/yr)	Major Source Threshold (T/yr)	Exceeds the Major Source Threshold?
Total HAPs	< 10	10	No
Total	< 16.53	25	No

As presented in the preceding table the PTE for each HAP is less than 10 T/yr and the PTE for all HAPs combined is less than 25 T/yr. Therefore, this facility is not a HAPS Major Source subject to Tier I requirements.

As discussed previously the Charmac facility is located in Twin Falls County (AQCR 63), which is designated as unclassifiable/attainment for PM_{2.5}, PM₁₀, SO₂, NO_x, CO, and Ozone for federal and state criteria air pollutants. Therefore, the following table compares the post-project facility-wide annual PTE for all criteria pollutants emitted by the source to the applicable criteria pollutant Major Source thresholds in order to determine if the facility is a criteria pollutant Major Source.

Table 4 PTE FOR CRITERIA POLLUTANTS COMPARED TO THE CRITERIA POLLUTANT MAJOR SOURCE THRESHOLDS

Criteria Pollutants	PTE (T/yr)	Major Source Threshold (T/yr)	Exceeds the Major Source Threshold?
PM ₁₀	5.56	100	No
SO ₂	0.01	100	No
NO _x	1.25	100	No
CO	0.53	100	No
VOC	32.17	100	No

As presented in the preceding table the PTE for each criteria pollutant is less than 100 T/yr. Therefore, this facility is not a criteria pollutant Major Source subject to Tier I requirements.

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). This section defines a Major stationary source as:

Any of the following stationary sources of air pollutants which emits, or has the potential to emit, 100 tons per year or more of any regulated NSR pollutant: Fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants (with thermal dryers), primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants (which does not include ethanol production facilities that produce ethanol by natural fermentation included in NAICS codes 325193 or 312140), fossil-fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants, and charcoal production plants, or

Notwithstanding the stationary source size specified in paragraph (b)(1)(i) of this section, any stationary source which emits, or has the potential to emit, 250 tons per year or more of a regulated NSR pollutant; or

Any physical change that would occur at a stationary source not otherwise qualifying under paragraph (b)(1) of this section, as a major stationary source, if the changes would constitute a major stationary source by itself.

This facility is not one of the facilities designated and does not have facility-wide emissions for any criteria pollutant that exceed 250 T/yr. In addition, the facility is not 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), the PSD requirements do not apply.

NSPS Applicability (40 CFR 60)

The facility is not subject to any NSPS requirements.

NESHAP Applicability (40 CFR 61)

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

MACT Applicability (40 CFR 63)

The facility may be subject to MACT standards in 40 CFR Part 63. The applicability determination for these standards follows.

40 CFR 63, Subpart HHHHHHH

National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

§ 63.11169 What is the purpose of this subpart?

In accordance with §63.11169, subpart HHHHHHH establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in auto body refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations.

§ 63.11170 Am I subject to this subpart?

In accordance with §63.11170(a), this mobile equipment coating operation is subject to this subpart because the facility will be operated as an area source of HAP. The facility 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. In addition, the facility will perform one or more activities listed in this section, including 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.

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

In accordance with §63.11171(b), the mobile equipment coating operation is the collection of mixing rooms and equipment; spray booths, curing ovens, 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 was 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 paint stripping or surface coating equipment, and the new surface coating equipment will be used at a source that was actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

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

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?

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 in paragraphs (e)(1) through (e)(5) of this section.

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.

In accordance with §63.11173(g), 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.

Compliance with these requirements is assured by PTC conditions 15 and 17.

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

In accordance with §63.11174(a), Table 1 of this subpart shows which parts of the General Provisions in subpart A apply. Compliance with these requirements is assured by PTC condition 17.

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 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.

§ 63.11175 What notifications must I submit?

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.

Compliance with these requirements is assured by PTC condition 28.

§ 63.11176 What reports must I submit?

In accordance with §63.11176(a), because the permittee is an owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous 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.

Compliance with these requirements is assured by PTC condition 29.

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?

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. Compliance with these requirements is assured by PTC condition 25.

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

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. Compliance with these requirements is assured by PTC condition 25.

§ 63.11179 Who implements and enforces this subpart?

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 had not delegated authority to the State of Idaho. However, IDAPA 58.01.01.107.03.i incorporates by reference all Federal Clean Air Act requirements including. Therefore, the requirements of this subpart have been placed in the permit.

§ 63.11180 What definitions do I need to know?

Terms used in this subpart are defined in accordance with §63.11180.

40 CFR 63 Subpart XXXXXX NESHAP for Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

§ 63.11514 Am I subject to this subpart?

Section (a) states that you are subject to this subpart if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of this section.

Paragraphs (a)(1) through (9) list the following operations: (1) Electrical and Electronic Equipment Finishing Operations (NAICS codes 335312 and 335999); (2) Fabricated Metal Products (NAICS codes 332117 and 332312); (3) Fabricated Plate Work (Boiler Shops) (NAICS codes 332313, 324410, and 332420); (4) Fabricated Structural Metal Manufacturing (NAICS code 332999); (5) Heating Equipment, except Electric (NAICS code 333414); (6) Industrial Machinery and Equipment Finishing Operations (NAICS codes 333120, 333132, and 333911); (7) Iron and Steel Forging (NAICS code 332111); (8) Primary Metal Products Manufacturing (NAICS code 332618); and (9) Valves and Pipe Fittings (NAICS code 332919).

As discussed previously in the Facility Information – Description Section Charmac fabricates trailers for recreational purposes, as well as for cargo and livestock transport. The manufacturing of trailers has a NAICS code of 336214 which is not subject to the requirements of Subpart XXXXXX and no further discussion is required.

CAM Applicability (40 CFR 64)

The facility is not classified as a major source (refer to Title V Classification section). Because the facility does not require a Title V permit, the requirements of CAM are not applicable.

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.

Permit Condition 1.1 was renumbered to 1.

Current Permit Condition Section 2.0 was removed from permit since this Section was for the Tier II permit facility-wide conditions and facility-wide permit conditions are not typically placed in PTC permits.

Permit Condition 3.1 was renumbered to 5.

Permit Condition 3.2 was renumbered to 6. In addition, this permit condition was updated to include a specific description of the sources subject to air permitting requirements at the facility.

Permit Condition 3.3 was renumbered to 7. In addition, this condition was updated to include the emissions limits from Appendices A and B from the current permit. These emissions limits were not changed as a result of this project.

Existing Permit Condition 3.4

The maximum amount of primer mixture and topcoat mixture sprayed in paint booth no. 1 and paint booth no. 2 shall not exceed 27.3 gallons per day and 9,965 gallons per any consecutive 12-month period. Primer and topcoat mixtures shall include, but not be limited to, white primer, black primer, reducer, and catalyst.

This condition was removed from the permit as a result of this project. This was done at the facility's request for flexibility to use additional paints and still demonstrate compliance with the current PM₁₀, VOC, HAPs, and TAPs emissions limits.

Existing Permit Condition 3.5

The static pressure drop across each paint booth exhaust filter shall be maintained within manufacturer specifications. All filter pads shall be replaced in accordance with manufacturer specifications.

This condition was removed from the permit as a result of this project. This was done because current DEQ guidance no longer requires that static pressure drop across a filter system be measured in order to determine if the filter system is operating properly. Instead, visible emissions from the exhaust of the filter system will be required to be checked to determine if the paint booth filter systems are operating properly.

Existing Permit Condition 3.6

Within 60 days of issuance of this permit, the permittee shall have developed an operations and maintenance (O&M) manual for the paint booth no. 1 and paint booth no. 2 filter systems. Once completed, the O&M manual shall be submitted to DEQ in accordance with Permit Condition 2.14. The O&M manual shall address the operation, maintenance, and repair of each filter system and shall, at a minimum, include the minimum and maximum pressure drop range across each filter system, methods of preventing malfunctions, and a schedule for routine inspection. The O&M manual shall be maintained on site at all times and shall be made available to DEQ representatives upon request.

This condition was replaced with new condition 13 as a result of this project. This was done because current DEQ guidance no longer requires that O & M manuals be submitted for baghouse/filter systems. Instead a Baghouse/Filter System Procedures document will be required to be submitted to DEQ (see new Permit Condition 13).

New Permit Condition 8 was added to the permit to ensure that the facility was not a HAP major source. The previous permit required that total HAP emissions be below 16.53 T/yr but there was no restriction that individual HAP emissions are below 10 T/yr. This was done because a HAP major source is defined as having facility-wide individual HAP emissions exceeding 10 T/yr and total HAPs combined exceeding 25 T/yr.

New Permit Condition 9 was added to the permit to ensure that the facility demonstrated compliance with IDAPA 58.01.01.585 and 586. The previous permit contained no requirement that the facility demonstrate compliance with IDAPA 58.01.01.585 and 586. This was done because current DEQ guidance is to have all “grand-fathered” facilities that come to DEQ for a permit modification (or initial permitting of an existing source) demonstrate compliance with IDAPA 58.01.01.585 and 586.

Permit Condition 2.8 was renumbered to 10.

Permit Condition 2.6 was renumbered to 11.

New Permit Condition 12 was added to the permit to ensure that the facility’s paint booth filter systems are operating properly. This was done using current DEQ guidance for permitting baghouse/filter systems.

New Permit Condition 13 was added to the permit to ensure that the facility develops, maintains, and submits to DEQ a paint booth filter systems procedures document. This was done using current DEQ guidance for permitting baghouse/filter systems.

New Permit Condition 14 was added to the permit to ensure that the emissions from the space heaters were properly accounted for in the permit application for previous permit T2-020412. This was done because emissions from the space heaters were based upon natural gas-firing.

New Permit Condition 15 was added to the permit to ensure that Methylene Chloride was not used as a paint stripper at the facility. This was done because of the new Federal requirements of Subpart HHHHHH.

New Permit Condition 16 was added to the permit to ensure that the facility conduct all painting in properly operating paint booths, with HVLP paint guns, with filters with a 96% PM₁₀ emissions capture efficiency. These specifications were provided to DEQ in the permit application for previous permit T2-020412.

As mentioned previously in the MACT Applicability Section, new Permit Condition 17 establishes general requirements, at the future compliance date, that will allow the facility to comply with the requirements of 40 CFR 63, Subpart HHHHHH – MACT Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

Permit Condition 2.7 was renumbered to 18.

New Permit Condition 19 establishes that the permittee shall maintain material purchase records and Material Safety Data Sheets (MSDS) for the trailer coating process.

New Permit Condition 20 establishes that the permittee shall maintain daily usage records of all materials used in the trailer coating process.

New Permit Condition 21 establishes that the permittee shall maintain monthly records of PM₁₀ emissions from the trailer coating process. This was done to provide the permittee flexibility to use additional paints and still demonstrate compliance with the current PM₁₀, VOC, HAPs, and TAPs emissions limits.

New Permit Condition 22 establishes that the permittee shall maintain monthly records of VOC emissions from the trailer coating process. This was done to provide the permittee flexibility to use additional paints and still demonstrate compliance with the current PM₁₀, VOC, HAPs, and TAPs emissions limits.

New Permit Condition 23 establishes that the permittee shall maintain monthly records of HAPs emissions from the trailer coating process. This was done to provide the permittee flexibility to use additional paints and still demonstrate compliance with the current PM₁₀, VOC, HAPs, and TAPs emissions limits.

New Permit Condition 24 establishes that the permittee shall maintain monthly records of TAPs emissions from the trailer coating process. This was done to provide the permittee flexibility to use additional paints and still demonstrate compliance with the current PM₁₀, VOC, HAPs, and TAPs emissions limits. Because Subpart HHHHHH regulates chromium, lead, manganese, nickel, or cadmium these TAPs were excluded from the TAPs

As mentioned previously in the MACT Applicability Section, new Permit Condition 25 establishes recordkeeping requirements, at the future compliance date, that will allow the facility to comply with the requirements of 40 CFR 63, Subpart HHHHHH – MACT Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

New Permit Condition 26 establishes that the federal requirements of 40 CFR Part 63 are incorporated by reference into the requirements of this permit per current DEQ guidance.

New Permit Condition 26 establishes that the permittee shall maintain records as required by the General Provisions.

As mentioned previously in the MACT Applicability Section, new Permit Condition 28 establishes reporting requirements, at the future compliance date, that will allow the facility to comply with the requirements of 40 CFR 63, Subpart HHHHHH – MACT Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

As mentioned previously in the MACT Applicability Section, new Permit Condition 29 establishes annual notification requirements, at the future compliance date, that will allow the facility to comply with the requirements of 40 CFR 63, Subpart HHHHHH – MACT Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.

APPENDIX A – PERMIT FEES

Table 5.1 lists the processing fee associated with this permitting action. Per IDAPA 58.01.01.225 the facility is subject to a processing fee of \$1,000.00 because its permitted annual change in emissions is 0.0 T/yr. Refer to the chronology for fee receipt dates.

Table A1 PTC PROCESSING FEE TABLE

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
PM ₁₀	0.00	0	0.00
SO ₂	0.00	0	0.00
NO _x	0.00	0	0.00
CO	0.00	0	0.00
VOC	0.00	0	0.00
HAPS	0.00	0	0.0
Totals:	0.00	0.00	0.00
Fee Due	\$1,000.00 Based upon an annual increase in emissions of < 1 T/yr for a modification to an existing source		

¹ – Metal HAPS emissions were accounted for in the facility's PM₁₀ emissions and VOC HAPS were accounted for in the facility's VOC emissions.

APPENDIX B – FACILITY DRAFT COMMENTS

The following comments were received from the facility on December 21, 2009:

Facility Comment: We have reviewed and accept the permit.

DEQ Response: The final permit will be issued.