

Statement of Basis

Final

Fleetwood Homes, Inc.

Nampa, Idaho

Facility ID No. 027-00049

Permit to Construct P-2009.0116

December 2, 2009

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Air Quality Permitting Analyst



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

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MSDS	Material Safety Data Sheets
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
O&M	operations and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
T/yr	tons per consecutive 12-calendar month period
TAP	toxic air pollutants
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

FACILITY INFORMATION

Description

The process begins in the chassis shop where the frame is constructed, and the axle/wheel assembly is mounted to the frame. The frame is then painted with a "No VOC" frame paint in the Sprayline Building. The frame is then moved to the main plant where most all of the home construction takes place. When the mobile home is near completion, it is moved to the Tape and Texture Building for interior work. After final inspections, the home is moved to the inventory yard and prepared for transport.

The facility uses a variety of paints, adhesives, sealants, cements, etc., which emit volatile organic compounds (VOCs) and toxic air pollutants. Emissions which occur within the building reach the atmosphere mainly through the plant ventilation systems.

There are two areas where emissions control equipment is used. The first is the downdraft spray booth located in the Sprayline Building which controls particulate emissions from the frame painting process. The second is in the cabinet shop area, where particulates from the sawing operations are vented to a cyclone outside the main plant. Waste material from the cyclone is dumped into a hopper.

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).

January 21, 1994 P-027-00049, Initial PTC, Permit status (S) upon issuance of this permit.

Application Scope

This PTC is a revision of an existing PTC. The applicant has notified DEQ of a change in ownership and facility name:

Former Owner:	Fleetwood Enterprises, Inc.
New Owner:	Fleetwood Homes, Inc.
Former Facility Name:	Fleetwood Homes of Idaho, Inc.
New Facility Name:	Fleetwood Homes, Inc.

Application Chronology

September 4, 2009	DEQ received an application. No application fees were required or received.
October 7, 2009	DEQ determined that the application was complete.
November 27, 2009	DEQ made available the draft permit and statement of basis for peer review.
December 2, 2009	DEQ issued the final permit and statement of basis. No processing fees were requested or received.

TECHNICAL ANALYSIS

Emissions Units and Control Devices

There are two areas where control equipment is used. The first is the downdraft spray booth located in the Sprayline Building which controls particulate emissions from the frame painting process. The second is in the cabinet shop area, where particulates from sawing operations are vented to a cyclone outside the main plant. Waste material from the cyclone is dumped into a hopper.

Table 1 EMISSIONS UNIT AND CONTROL DEVICE INFORMATION

ID No.	Source Description	Emissions Controls	Emissions Discharge Point ID No. and/or Description
NA	Spray Booth Stack	Name: Andrea Downdraft Spray Booth Manufacturer: Binks Manufacturing PM/PM ₁₀ efficiency: 98.0%	Exit height: 25 ft Exit diameter: 2.83 ft Exit flow rate: 13960 acfm Exit temperature: 70 °F
NA	Main Plant	Name: Cyclone Manufacturer: RW Manufacturing	No stack. Discharge to hopper below cyclone.
NA	Tape and Texture Building	None	None

Emissions Inventories

Emissions from the facility are not changing as a result of this permitting action.

Ambient Air Quality Impact Analyses

Ambient air impact analyses are not required because the emissions are not changing as a result of this permitting action.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Canyon 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)

The proposed project did not meet the permit to construct exemption criteria in IDAPA 58.01.01.220–223. Therefore, a permit to construct was required in accordance with IDAPA 58.01.01.201. 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)

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

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

At the time of the previous permit issuance, the facility was not classified as a major facility as defined in IDAPA 58.01.01.008.10. The facility was classified as “B” because the actual and potential emissions are below all applicable major source thresholds. Therefore, the requirements of IDAPA 58.01.01.300–399 were not applicable to this permitting action.

PSD Classification (40 CFR 52.21)

At the time of the previous permit issuance, the facility was not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and did not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr. Therefore requirements of 40 CFR 52.21 were not applicable to this permitting action.

NSPS Applicability (40 CFR 60)

At the time of the previous permit issuance, the facility was not subject to any NSPS requirements.

NESHAP Applicability (40 CFR 61)

At the time of the previous permit issuance, the facility was not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

At this time, DEQ does not have the information necessary to assess whether or not the facility is subject to 40 CFR 63 Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. If the permittee obtains an exemption concurrence for this subpart from EPA, the permit conditions relating to this subpart will not require compliance.

§ 63.11169

What is the purpose of this subpart?

In accordance with §63.11169, subpart HHHHHH establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in 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 to mobile equipment.

According to the definitions in §63.11180:

Mobile equipment - “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.” Since a manufactured home may be drawn rather than driven, it need not be self propelled. Because a manufactured home is typically drawn on a roadway during travel to the final point of installation, it would be considered mobile equipment under the rule.

Hazardous air pollutants are found in many paints, adhesives, sealants, cements, and other products that may be in use at the facility. Target HAPs, those compounds of chromium, lead, manganese, nickel, and cadmium, are of particular concern. DEQ does not have documentation to determine the HAP content of the products on-site. If none of the products on site contain HAPs, Subpart HHHHHH permit conditions would not apply.

Continuation of this applicability determination is based on the assumption that HAPs are present in the products used at the facility.

§ 63.11171

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

In accordance with §63.11171(c), this mobile equipment surface coating operation is an existing source because it commenced construction prior to September 17, 2007, and was actively engaged in 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?

If the facility is not involved in paint-stripping activities, the requirements of §63.11173(a) through (f) are not applicable. Because the facility is a mobile equipment surface 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.

Compliance with these requirements is assured by the PTC Operating Requirement for 40 CFR 63, Subpart HHHHHH.

§ 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 the PTC Operating Requirement for 40 CFR 63, Subpart HHHHHH.

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 mobile equipment 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 the PTC Notification and Reporting Requirements for 40 CFR 63, Subpart HHHHHH.

§ 63.11176

What reports must I submit?

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.

Compliance with these requirements is assured by the PTC Notification and Reporting Requirements for 40 CFR 63, Subpart HHHHHH.

§ 63.11177

What records must I keep?

In accordance with §63.11177, because the permittee is the owner or operator of a mobile equipment 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 indicated that paint stripping operations take place at the facility,, the requirements of paragraphs (e) and (f) of this section may not be applicable.

Compliance with these requirements is assured by the PTC Monitoring and Recordkeeping Requirements for 40 CFR 63, Subpart HHHHHH.

A site methylene chloride (MeCl) minimization plan may be applicable if paint stripping activities take place at the facility.

§ 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 the PTC Monitoring and Recordkeeping Requirements for 40 CFR 63, Subpart HHHHHH.

§ 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 §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).

Fleetwood Homes manufacture mobile homes. The manufacturing of mobile homes has a NAICS code of 321991 which is not subject to the requirements of Subpart XXXXXX and no further discussion is required.

CAM Applicability (40 CFR 64)

At the time of the previous permit issuance, the facility was not classified as a major source because it did not emit or have the potential to emit ten tons per year of any single HAP, or twenty-five tons of total HAPs, or one hundred tons per year of any regulated air pollutant. Because the facility did not require a Title V permit, the requirements of CAM were not applicable.

Permit Conditions Review

Universal changes:

SIC code on cover page of existing permit:

2452

Statement on cover page of revised permit:

2451

Explanation:

SIC code 2452 is for "Prefabricated wood building". The associated NAICS code is 321992 which specifically excludes mobile homes.

SIC code 2451 is for "Mobile homes". NAICS code 321991 specifically includes "Manufactured Home (Mobile Home) Manufacturing".

Statement on cover page of existing permit:

This permit is not transferable to another person, place, piece or set of equipment.

Statement on cover page of revised permit:

None.

Explanation: The statement has been deleted from all PTCs because these permits are now transferable.

Reference in existing permit:

IDAPA 16.01.01

Reference in revised permit:

IDAPA 58.01.01

Explanation: When the permit was issued in 1994, The Rules for the Control of Air Pollution in Idaho were stated IDAPA 16.01.01. The Rules are now are now stated in IDAPA 58.01.01. The IDAPA references were updated throughout the document.

Statement(s) in existing permit:

This plan/record shall remain on-site (for two years, or no time period stated) and be made available to inspection personnel upon request.

Statement in revised permit:

This plan will remain on site for a minimum of five years and shall be made available to DEQ representatives upon request.

Explanation:

This update is required by the most recent Permit to Construct General Provisions.

Permit condition changes:

Existing permit number 3.3: Spray Booth Operation and Maintenance Plan:

Within one hundred eighty (180) days after issuance of this permit, the permittee shall develop and maintain an Operation and Maintenance Plan for the Downdraft Spray Booth and Filtering System.

Revised Permit: Operating Requirements - Spray Booth Operation and Maintenance Plan

The permittee shall update an Operation and Maintenance Plan for the Downdraft Spray Booth and Filtering System.

Explanation:

The new wording acknowledges that the initial O&M plan was developed and now must be updated as needed.

Revised permit: Emissions Limits – Odors; and Monitoring and Recordkeeping Requirements – Odor Complaints

The facility is subject to the General Rules of the state of Idaho that pertain to odor control.

Revised Permit Conditions relating to 40 CFR 63 Subpart HHHHHH: Stripping and Miscellaneous Surface Coating Operations, General Compliance Requirements

Subpart HHHHHH is a new federal regulation that was not specifically referenced in the existing permit. However, the permit cover page does state in the second paragraph “This permit...(c) does not release the permittee from compliance with other applicable federal, state, tribal or local laws, regulations, or ordinances...” This subpart has been added to the revised permit due to the likelihood that it is applicable to the facility.

DEQ did receive EPA confirmation that Subpart HHHHHH is applicable to the manufacture of mobile homes because mobile homes do fall into the category of mobile equipment. The next step in determining applicability is an evaluation of chemical constituents of the various products used at the facility to determine if any target HAPs are emitted. The definition of “target HAPs”, and the quantities of concern, are provided in the Subpart. DEQ does not have the MSDS sheets, product quantities, or other documentation, to make this determination.

It is important to note that the subpart contains several timelines which must be met in order to assure compliance.

If the facility is exempt from Subpart HHHHHH, compliance with these permit conditions would not be required.

Existing permit number 5.1: Reporting Requirements

If any materials are substituted for those which were supplied with this application, the Material Safety Data Sheet shall be submitted to demonstrate compliance with Section 3.2 of this permit. (Section 3.2 is Material Change Requirements)

Revised permit: Monitoring and Recordkeeping Requirements – Monitor MSDS

The condition has been updated to reflect current permitting practices.

To demonstrate compliance with the Material Change Requirement permit condition, the following Material Safety Data sheets shall be maintained on-site and shall be made available for DEQ representatives upon request:

- *Those supplied with the application for permit 027-00049, issued on January 21, 1994 for the products in use at that time.*
- *For any products which have been substituted for those products in use at the time of the application for permit 027-00049, issued on January 21, 1994.*

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 58.01.01.209.04