



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Permit to Construct and Tier II Operating Permit No. P-2009.0051

Final

Interstate Group LLC

Nampa, Idaho

Facility ID No. 027-00084

August 31, 2009

Eric Clark 

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.

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Acronyms, Units, and Chemical Nomenclature

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
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HAP	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
MMBtu	million British thermal units
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
PC	permit condition
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
TAP	toxic air pollutant
T2	Tier II operating permit
T2/PTC	Tier II operating permit and permit to construct
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

1. FACILITY INFORMATION

1.1 Facility Description

The Interstate Group Nampa facility manufactures over-the-road trailers of various sizes. Constructing the trailer frames involves welding the frame channel rails and completing the skeletal structure of the trailer using bent and straight tubes. Following completion of the frames, the trailer box structure is attached to pre-manufactured axles and wheels. The trailer is then washed, dried, and wired for lighting. In this step, the trailers are wiped down with Hurrifsafe 9100 to prepare the metal surfaces for be painted. The next step in the process is to apply paint-finishing materials to the sheet metal box shell in the paint booth. After painting, the wiring is completed. Plywood is then installed for interior and floor surfaces and then undercoated. The out side of the trailer is covered with the prefinished sheet metal and the final trim and accessories are installed. The finished product is a complete trailer ready for sale to the trailer dealers.

1.2 Permitting Action and Facility Permitting History

This T2/PTC is a permit modification. 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).

September 25, 2008	T2-2008.0096, a Tier II operating permit and PTC renewal. No changes to permit were made. Permit Status: (S).
August 27, 2003	T2-030032, a revision of the permitting action of T2-010717, Permit Status: (S).
March 13, 2003	T2-010717, the purpose of this permitting action was to establish federally enforceable limits necessary to exempt the facility from Title V permitting requirements and to demonstrate the facility's compliance with ambient air standards for criteria pollutants, Permit status (S).

2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

2.1 Application Scope

The permitting action is for a modification to operations per facility request. Two paints are being added to those that are currently permitted. Specific usage limitations and monthly hours of operation limits are added. Also, 40 CFR 63 subpart HHHHHH compliance verbiage is added for future applicability.

2.2 Application Chronology

April 23, 2009	DEQ received the request for paint modification
May 22, 2009	DEQ deemed the application to be incomplete
June 4, 2009	DEQ deemed the application to be complete
June 24, 2009	Sent to Facility for draft review
June 30, 2009	DEQ received \$1,000 processing fee
July 13, 2009 through August 12, 2009	30 Day public comment period (No comments received)
August 12, 2009	Received comments from facility updating permit condition 3.7
August 31, 2009	Final permit issued to facility

3. TECHNICAL ANALYSIS

3.1 Paints, Adhesives, Solvents, Cleaners and Control Devices

Table 3.1 PAINTS, ADHESIVES, SOLVENTS, CLEANERS AND CONTROL DEVICE INFORMATION

Emission Unit /ID No.	Emissions Unit Description	Control Device Description
Permit Section 3	Hurrisafe 9100 trailer cleaning	None
Permit Section 3	Painting operations inside paint booth, HVLP spray gun	Paint booth, including arrestor filter pads for particulate matter control
Permit Section 3	Undercoat painting outside building, Airless spray equipment	Partial enclosure
Permit Section 3	Other sealants, adhesives, coatings	None

3.2 Emissions Inventory

All post-project emissions calculations are based on the following monthly usages:

- 550 gallons of the ZPG-1021FR Low VOC
- 300 gallons of the Z Shield 7800 High Gloss paint
- 200 gallons of the Quad sealant
- 58.6 gallons of the Almond Sa-167
- 45 gallons of the Columbia black paint
- 17 gallons of the silicone project 1
- 15 gallons of the black spray
- 13 gallons of the Mineral Spirits
- 9 gallons of the gray primer
- 3 gallons of xylene paint
- 2.15 gallons of the silver spray

Also, PM₁₀ emissions are assuming a 96% efficient filter for the undercoating and a 98.65% efficient filter for the paint booth. 40% transfer efficiency is also assumed for the operation paint guns. Also other assumed data such as paint density and percent solids were taken from Material Safety Data Sheets (MSDS) provided by Interstate Group LLC personnel. All pre-project emissions are taken from the previous permit and statement of basis, T2-2008.0096 issued August 18, 2008.

The stated filter efficiencies are based on manufacturer information provided by the applicant.

Table 3.2 PRE-PROJECT EMISSION INVENTORY BASED ON PTE

Source Description	Interstate Group, Nampa Potential Emissions ^a – Hourly (lb/hr) and Annual (T/yr)													
	PM/PM ₁₀		NOx		CO		SO ₂		VOC ^b		Single HAPs		Total HAPs	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Welding Operations	0.076	0.33												
Paints, Coatings, Adhesives, and solvents (facilitywide)									29.7	35.6	0.83	9.88	1.5	18.0
Paints and coatings in paint booth (particulate emissions)	0.9	1.1												
Undercoating application (particulate emissions)	0.49	2.1												
Air makeup unit 1.33 MM Btu , natural gas	0.01	0.04	0.13	0.57	0.11	0.47	8 E-4	0.004	0.007	0.03	--	--	0.004	0.018
Total	1.48	3.57	0.13	0.57	0.11	0.47	8 E-4	0.004	29.71	35.63	0.83	9.88	1.51	18

^a As determined by a pollutant- specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

^b The previous permit stated that the VOC lb/hr limit was 2.97 when it should have been 29.7. According to the application submitted February 26, 2002, Table A4 clearly shows 29.7 lb/hr and 29.7 T/yr to be the PTE. The 35.6 T/yr was a 20% increase for flexibility. Also if 35.6 T/yr is divided by 12 the result is 2.97 T/mo as is stated in the permit.

Table 3.2 (continued) PRE-PROJECT EMISSION INVENTORY BASED ON PTE

Interstate Group, Nampa Potential Emissions ^a – (lb/hr) and Annual (T/yr)												
Source Description	Cr		Mn		Ni		Ethylbenzene		Ethyl Glycol		Hexane	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Welding Operations	1.46E-5	6.4E-5	5E-3	2.2E-2	1.46E-5	6.4E-5	--	--	--	--	--	--
Paints, Coatings, Adhesives, and solvents (facilitywide)							1.86	8.15	0.12	0.53	0.01	0.04
Air makeup unit 1.33 MM Btu , natural gas											0.0039	0.017
Total	1.46E-5	6.4E-5	5E-3	2.2E-2	1.46E-5	6.4E-5	1.86	8.15	0.12	0.53	0.014	0.057

^a As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

Table 3.2 (continued) PRE-PROJECT EMISSION INVENTORY BASED ON PTE

Interstate Group, Nampa Potential Emissions ^a – Hourly (lb/hr) and Annual (T/yr)										
Source Description	Toluene		Xylene		Formaldehyde		Methylene diphenyl isocyanate		n-Butyl alcohol	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Paints, Coatings, Adhesives, and solvents (facilitywide)	4.8	9.88	8.23	9.88	--	--	0.014	0.06	0.01	0.04
Air makeup unit 1.33 MM Btu , natural gas					0.0002	0.0009				
Total	4.8	9.88	8.23	9.88	0.0002	0.0009	0.014	0.06	0.01	0.04

^a As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

Table 3.3 POST-PROJECT EMISSION INVENTORY BASED ON PTE

Interstate Group, Nampa Potential Emissions ^a – Hourly (lb/hr) and Annual (T/yr)														
Source Description	PMP/PM ₁₀		NOx		CO		SO ₂		VOC		Single HAPs		Total HAPs	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Welding Operations	0.076	0.33											0.005	0.02
Paints, Coatings, Adhesives, and solvents (facility-wide)									11.23	12.13	2.23	2.41	3.61	3.91
Paints and coatings in paint booth (particulate emissions)	0.057	0.062												
Undercoating application (particulate emissions)	.0581	0.63												
Air makeup unit 1.33 MM Btu , natural gas	0.01	0.04	0.13	0.57	0.11	0.47	8 E-4	0.004	0.007	0.03	--	--	0.004	0.018
Total	0.72	1.06	0.13	0.57	0.11	0.47	8 E-4	0.004	11.24	12.16	2.23^b	2.41^b	3.62	3.95

^a As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

b. The single HAPs values are based on xylene as that was the greatest emissions for the regulated HAPs.

Table 3.3 (continued) POST-PROJECT EMISSION INVENTORY BASED ON PTE

Interstate Group, Nampa Potential Emissions ^a – Hourly (lb/hr) and Annual (T/yr)												
Source Description	Cr		Mn		Ni		Ethylbenzene		Ethyl Glycol		Hexane	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	Lb/hr	T/yr	lb/hr	T/yr
Welding Operations	1.46E-5	6.4E-5	5E-3	2.2E-2	1.46E-5	6.4E-5	--	--	--	--	--	--
Paints, Coatings, Adhesives, and solvents (facility-wide)							0.677	0.731	0.084	0.091	--	--
Air makeup unit 1.33 MM Btu , natural gas											0.0039	0.017
Total	1.46E-5	6.4E-5	5E-3	2.2E-2	1.46E-5	6.4E-5	0.677	0.731	0.084	0.091	0.0039	0.017

^a As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

Table 3.3 (continued) POST-PROJECT EMISSION INVENTORY BASED ON PTE

Interstate Group, Nampa										
Potential Emissions ^a – Hourly (lb/hr) and Annual (T/yr)										
Source Description	Toluene		Xylene		Formaldehyde		Cobalt Alkanoate		Butyl Acetate	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Paints, Coatings, Adhesives, and solvents (facilitywide)	0.622	0.672	2.23	2.41	--	--	0.275	0.297	0.65	0.702
Air makeup unit 1.33 MM Btu , natural gas					0.0002	0.0009				
Total	0.622	0.672	2.23	2.41	0.0002	0.0009	0.275	0.297	0.65	0.702

^a As determined by a pollutant- specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

Table 3.3 (continued) POST –PROJECT EMISSION INVENTORY BASED ON PTE

Interstate Group, Nampa									
Potential Emissions ^a – Hourly (lb/hr) and Annual (T/yr)									
Source Description	Aliphatic Petroleum Distillates		Acetone		Tertiary Butyl Acetate		VM&P Naphtha		
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	
Paints, Coatings, Adhesives, and solvents (facility-wide)	0.98	2.59	2.44	2.64	1.95	2.11	3.9	4.21	
Total	0.98	2.59	2.44	2.64	1.95	2.11	3.9	4.21	

^a As determined by a pollutant- specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

Table 3.3 (continued) POST –PROJECT EMISSION INVENTORY BASED ON PTE

Interstate Group, Nampa							
Potential Emissions ^a – Hourly (lb/hr) and Annual (T/yr)							
Source Description	Stoddard Solvent		Methyl Propyl Ketone		Aromatic 150		
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	
Paints, Coatings, Adhesives, and solvents (facility-wide)	8.18	8.83	0.65	0.702	0.13	0.14	
Total	8.18	8.83	0.65	0.702	0.13	0.14	

^a As determined by a pollutant- specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

Table 3.4 TOTAL CHANGE EMISSION INVENTORY BASED ON PTE

Interstate Group, Nampa														
Potential Emissions ^a – Hourly (lb/hr) and Annual (T/yr)														
Source Description	PM/PM ₁₀		NO _x		CO		SO ₂		VOC		Single HAPs ^b		Total HAPs ^b	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project	1.48	3.57	0.13	0.57	0.11	0.47	8 E-4	0.004	29.8	35.63	0.83	9.88	1.51	18
Post-Project	0.72	1.06	0.13	0.57	0.11	0.47	8 E-4	0.004	11.23	12.23	2.23	2.41	3.62	3.95
Total Change	-0.76	-2.51	0.0	0.0	0.0	0.0	0.0	0.0	-18.57	-23.4	1.4	-7.47	2.11	-14.05

^a As determined by a pollutant- specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

^b It is suspected that the lb/hr for both single and Total HAPs for the pre-project totals are in T/mo because that is how the previous permit was written. Also 1.51 * 12 is approximately 18, while the 9.88 from the xylene divided by 12 is approximately 0.83. Also, according to the application states the anticipated work schedule is 2000 hours/year. Therefore the lb/hr and T/yr should have identical values as there are 2000 lb/ton and 2000 hours/year.

**Table 3.5 CONTROLLED TAP AND HAP EMISSIONS SUMMARY
POTENTIAL TO EMIT**

TAPs	24-hour Average ^a	Emissions Screening Level ^b
	lb/hr	lb/hr
Acetone	2.44	119
n-Butyl Acetate	0.65	47.3
Tertiary Butyl Acetate	1.95	63.3
Methyl Propyl Ketone	0.65	46.7
Stoddard Solvent	8.18	35
VM&P Naphtha	3.9	91.3
Toluene ^c	0.62	25
Xylene ^c	2.23	29
Ethyl Benzene ^c	0.68	29
Ethylene Glycol ^c	0.084	0.846

^a Based on 180 hours/month operations of each paint.

^b 24-hour average only applies to non-carcinogenic TAPs

^c These are the four regulated HAPs that comprise the HAP calculations shown in the prior tables.

3.3 Ambient Air Quality Impact Analysis

There was no increase of total HAPs, VOC, or PM from this permitting action. Therefore, it was determined that modeling was not necessary because of HAPs/TAPs lb/hr 24-hr average was less than the corresponding Emission Level in IDAPA 58.01.01.585 (See Table 3.5). Additionally, the calculated averages assumed 24 consecutive hours of painting or an absolute worst case scenario and were used for comparison with IDAPA 58.01.01.585. The total pounds of each pollutant per month was determined then divided by the total number of allowable working hours per month, 180. Also, the assumed usage of all paints, solvents, adhesives and cleaners were maximized as much as possible. Therefore, if all permit conditions are adhered by, the calculated values would not be reached much less the emission limits associated with Table 585.

4. REGULATORY REVIEW

4.1 Attainment Designation (40 CFR 81.313)

The facility is located in Canyon County which is designated as attainment or unclassifiable for PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone. Reference 40 CFR 81.313.

4.2 Permit to Construct (IDAPA 58.01.01.201)

Interstate Group LLC operations do not meet the exemption criteria in IDAPA 58.01.01.220-223. A PTC is therefore required for this facility.

4.3 Tier II Operating Permit (IDAPA 58.01.01.401)

Interstate Group LLC is making a PTC change to their combination permit. Therefore the Tier II operating permit is not changing. AS a result the expiration date of the permit will remain September 25, 2013.

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

This facility is not applicable to Title V.

4.5 PSD Classification (40 CFR 52.21)

This facility is not applicable to PSD.

4.6 NSPS Applicability (40 CFR 60)

This facility is not applicable to NSPS.

4.7 NESHAP Applicability (40 CFR 61)

This facility is not applicable to NESHAPS.

4.8 MACT Applicability (40 CFR 63)

At the time of this permit modification this facility is not applicable to a MACT. However, MACT Subpart HHHHHH requires compliance for existing sources by January 10, 2011 for all facilities involved with paint stripping, coating, auto body, and misc. Compliance, record and recordkeeping, and notification requirements are added to this permitting action.

4.9 CAM Applicability (40 CFR 64)

This facility is not applicable to CAM.

4.10 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 2.12 and 2.13

An Incorporation by Reference condition was added to specify that federal rules apply in any discrepancy in the permit. The NESHAP General Compliance Requirements for subpart HHHHHH were also added.

Permit Condition 3.2

The cleaning solution used on the trailers was updated from a xylene-based solution to Hurrifsafe 9100. This was done to help reduce the amount of xylene emitted by the facility. The changes were made within Table 3.I.

Permit Condition 3.3

VOC and PM limits were updated to reflect the re-addition of the Columbia black paint and the gray primer from the public comment draft. Also, the HAPs limit was removed as it is inherently limited by the paint usage limit in PC 3.6.

Permit Conditions 3.4 and 3.5

Verbiage discussing the use of the two equations was reworded for clarity and better understanding by the applicant. Also, the transfer and filter efficiencies were updated.

Permit Condition 3.6

During coating or painting operations, the permittee shall not exceed the following usage limits of paint, coating, adhesive, solvent, or cleaner during any calendar month:

- 550 gallons of the ZPG-1021FR Low VOC or equivalent
- 300 gallons of the Z Shield 7800 High Gloss paint or equivalent
- 200 gallons of the Quad sealant or equivalent
- 58.6 gallons of the Almond Sa-167 or equivalent
- 45 gallons of the Columbia black paint or equivalent
- 17 gallons of the silicone project 1 or equivalent
- 15 gallons of the black spray or equivalent
- 13 gallons of the Mineral Spirits or equivalent
- 9 gallons of the Columbia Gray Primer or equivalent
- 3 gallons of xylene paint or equivalent
- 2.15 gallons of the silver spray or equivalent

For the purposes of this permit condition, “or equivalent” is defined as the HAP, TAP and VOC content for the new coating, as listed on the MSDS, which is equal to or less than the HAP, TAP and VOC content, as listed on the MSDS, of the coating listed in this permit.

This limit was added to clearly specify what paints and other products are permitted and their corresponding usage. The “or equivalent” verbiage was added to allow the facility some flexibility in paint usage if so desired.

Permit Condition 3.7

The facility shall not operate more than 180 hours per month.

This condition limits the monthly operating hours to 180 hours. This was added at the request of the facility to demonstrate compliance with TAP EL.

Permit Condition 3.8

The filtering system requirement was increased from 85% to 96% again to stay below the HAPs and PM₁₀ limits for the undercoating and increased to 98.65% for the paint booth. .

Permit Condition 3.10

General compliance with 40 CFR 63 subpart HHHHHH was added into the permit for the facility applicability requirement that goes into effect January 10, 2011.

Permit Condition 3.12

The permittee shall collect and maintain records of the following information to demonstrate compliance with hourly operations and material usage permit conditions:

- *On a monthly basis, the operating hours of the facility.*
- *On a monthly basis, the material usage rate of undercoat, and trailer, in gallons per calendar month.*

Monitoring and recordkeeping requirements were added to verify the permittee is complying with conditions 3.7 and 3.8.

Permit Condition 3.13

Filter visible emissions monitoring was added in place of O&M manual and pressure drops requirements. The following three previous permit conditions were removed:

Old Permit Condition 3.8

The permittee shall have installed a manometer on the paint booth to measure the pressure drop across the filter system.

Old Permit Condition 3.9

The pressure drop across the system shall be maintained with the manufacturer and O&M manual specifications.

Old Permit Condition 3.10

The permittee shall have developed an O&M Manual for the air pollution control equipment used to control PM emissions from the paint booth. The O&M manual shall specify the maintenance requirements for the filter pads. The O&M manual shall be maintained on site at all times and shall be made available to Department representatives upon request.

The removal was done to be more consistent with current department policies.

Permit Condition 3.14

This condition was added to illustrate the necessary recordkeeping that goes along with 40 CFR 63 subpart HHHHHH.

Permit Condition 3.15

This condition was added in accordance with subpart HHHHHH for notification and reporting.

Permit Condition 3.16

This condition was added in accordance with subpart HHHHHH for addresses of where to send any generated reports.

Table 4.1 was also updated to reflect the changes in emission rate limits.

5. PERMIT FEES

Table 5.1 lists the processing fee associated with this permitting action. The facility is subject to a processing fee of \$1,000 because its permitted increase of emissions is less than 1 T/yr. This figure is determined by IDAPA 58.01.01.225. Refer to the chronology for fee receipt dates.

Table 5.1 PROCESSING FEE TABLE

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.57	0.57	0.00
SO ₂	0.004	0.004	0.00
CO	0.47	0.47	0.00
PM ₁₀	3.57	1.06	-2.51
VOC	35.63	12.13	-23.50
TAPS/HAPS	18	3.95	-14.05
Total:	58.2	18.2	-40.06
Fee Due	\$ 1,000.00		

6. PUBLIC COMMENT

An opportunity for public comment period on the T2/PTC application was provided from April 29, 2009 to May 14, 2009 in accordance with IDAPA 58.01.01.209.01.c. During this time, there were no comments on the application and there was a request for a public comment period on DEQ's proposed action.

A public comment period was made available to the public from July 13, 2009 to August 12, 2009. During this time, comments were not submitted in response to DEQ's proposed action.

Appendix A – AIRS Information

AIRS/AFS Facility-wide Classification – Data Form

Facility Name: Interstate Group LLC
Facility Location: 224 Carnation Dr. Nampa, ID
Facility ID: 027-00084 **Date:** August 18, 2009
Project/Permit No.: P-2009.0051 **Completed By:** Eric Clark

- Check if there are no changes to the facility-wide classification resulting from this action. (compare to form with last permit)
 Comments:
- Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

	SO2	PM10	VOC	
Area Classification:	U	U	U	DO NOT LEAVE ANY BLANK

Check one of the following:

- SIP [0]** - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)
 OR
 Title V [V] - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	B	B	B	B	B	B	B

- PSD [6]** - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- NSR - NAA [7]** - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- NESHAP [8]** - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

- NSPS [9]** - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- MACT [M]** - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

Appendix B – Emissions Inventory

TABLE B.2 PROJECTED FACILITY USAGE AND MONTHLY EMISSIONS

	Gallons / month	VOC	Stoddard Solvent	Aliphatic Petroleum Distillates	Toluene	Xylene	Tertiary Butyl Acetate	Butyl Acetate
		lb/mo	lb/mo	lb/mo	lb/mo	lb/mo	lb/mo	lb/mo
Black Paint	45	226.37	--	--	93.62	87.29	--	--
Z Shield 7800	300	982.80	--	--	--	--	351	117
Gray Primer	9	35.48	--	--	1.69	--	--	--
Black Spray	15	53.85	--	--	12.18	--	--	--
Silver Spray	2.15	9.18	--	--	4.47	--	--	--
Almond (Sa-167)	58.6	15.2	--	--	--	--	--	--
Silicone (project 1)	17	3.04	--	--	--	--	--	--
Quad Sealant	200	492	295.2	--	--	295.2	--	--
Xylene	3	18.49	--	--	--	18.49	--	--
Mineral Spirits	13	79.41	--	--	--	--	--	--
ZPG-1021 Low VOC	550	105.93	1177	176.55	--	--	--	--
Total	1212.75	2021.75	1472.2	176.55	111.96	400.98	351	117

TABLE B.2 (CON'T) PROJECTED FACILITY USAGE AND MONTHLY EMISSIONS

	Methyl Propyl Ketone	Aromatic 150	VM&P Naphtha	Acetone	Ethyle Benzene	Ethylene Gycol	Cobalt Alkanoate	PM ^a
	lb/mo	lb/mo	lb/mo	lb/mo	lb/mo	lb/mo	lb/mo	lb/mo
Black Paint	--	--	--	--	18.04	--	49.52	1.04
Z Shield 7800	117	23.4	702.00	--	--	--	--	8.74
Gray Primer	--	--	--	--	--	--	--	0.42
Black Spray	--	--	--	25.23	--	--	--	--
Silver Spray	--	--	--	2.17	--	--	--	--
Almond (Sa-167)	--	--	--	--	--	15.2	--	--
Silicone (project 1)	--	--	--	--	--	--	--	--
Quad Sealant	--	--	--	--	98.4	--	--	--
Xylene	--	--	--	--	5.44	--	--	--
Mineral Spirits	--	--	--	--	--	--	--	--
ZPG-1021 Low VOC	--	--	--	411.95	--	--	--	104.52
Total	117	23.4	702	439.35	121.88	15.2	49.52	114.72

a. - The PM calculation for each paint component is based on 40% transfer efficiency and 98.65% filter efficiency from the Z Shield 7800, black paint and gray primer and 96% filter efficiency for the ZPG-1021 Low VOC.

It shall be noted that the following calculations are based on 180 total hours of operation per month and 7437.5 total production footage. Hourly emissions are based on a worst case scenario 24-hour operation. It is assumed that the painting operations run for an uninterrupted 24-hour period.

TABLE B.3 – CORRESPONDING HOURLY AND ANNUAL EMISSIONS

	VOC	Stoddard Solvent	Aliphatic Petroleum Distillates	Toluene	Xylene	Tertiary Butyl Acetate	Butyl Acetate
Total lb/hr	11.232	8.179	0.981	0.622	2.228	1.950	0.650
Total T/yr	12.131	8.833	1.059	0.672	2.406	2.106	0.702
	Methyl Propyl Ketone	Aromatic 150	VM&P Naphtha	Acetone	Ethyle Benzene	Ethylene Glycol	PM
Total lb/hr	0.650	0.130	3.900	2.441	0.677	0.084	0.637
Total T/yr	0.702	0.140	4.212	2.636	0.731	0.091	0.688
	THAPs						
Total lb/hr	3.611						
Total T/yr	3.900						

TABLE B.4 – HOURLY EMISSIONS FROM TWO ADDITIONAL PAINTS

Paint booth Operations (lb/hr)								
Material	Gallons / month	VOCs	Tertiary Butyl Acetate	Butyl Acetate	Methyl Propyl Ketone	Aromatic 150	VM&P Naphtha	PM
Z Shield 7800	300	5.56	1.95	0.65	0.68	0.13	3.9	0.049
Undercoating Paints (lb/hr)								
Material	Gallons / month	VOCs	Stoddard Solvent	Aliphatic Petroleum Distillates	Acetone	PM		
ZPG-1021	550	0.589	6.539	0.98	2.289	0.581		

Appendix C – Facility Comments

Facility Comments during Facility Draft

- 1 – Xylene is no longer used to clean the trailers. Permit was updated to reflect the Hurrifsafe 9100 paint prep.
- 2 – The amount of the ZPG-1021FR Low VOC undercoating paint was reduced from 600 to 550 gallons/month.
- 3 – The control efficiency of the paint booth filters were decreased from 99.67% to 98.65%
- 4 – Some verbiage about undercoating paint was added to the facility description of the statement of basis.
- 5 – Some typos within Table 3.3 of the statement of basis were fixed. The unit headings were not all accurate.
- 6 – The emission inventory was updated to match the total usage of all painting products within the facility. As a result, limits of PM₁₀, VOCs and THAPs changed slightly.

Facility Comments during Public Comment Period

Permit Condition 3.7 – The facility requested a change to this condition to incorporate all products used at the facility.

Response - The updated condition incorporates all products and their explicit usage amounts. The previous condition restricted them to only two painting products. This change did not result in an emissions increase from the public comment period draft. In fact because of this request it was discovered that the amount of THAPs that were calculated and discussed in the public comment draft were incorrect and were adjusted. The adjustment resulted in a decrease of THAPs from 23.09 T/yr to 3.91 THAPs. The air quality impact produce by the facility was reduced because of this error correction. A letter from Interstate Group LLC requesting this change is attached.

Interstate Group, L.L.C.

224 Carnation Dr.
Nampa, ID 83687

Phone (208) 442-7618
Ted Rowley Safety Manager



Fax (208) 468-0653

August 6, 2009

Attention:
Eric Clark
DEQ
Boise, Idaho 83706

Under condition 3.7, we would like to request a change and have it updated with the following products. Columbia black paint and Columbia gray primer in the event that we would need to temporarily use these products.

Thanks
Ted Rowley
Safety Manager