

## **Statement of Basis**

**Permit to Construct No. P-2014.0024  
Project ID 61568**

**Ground Force Mfg.  
Post Falls, Idaho**

**Facility ID 055-00122**

**Final**

**October 22, 2015** *D.P.*  
**Darrin Pampaian, P.E.**  
**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

ASHRAE	American Society of Heating, Refrigerating, and Air-Conditioning Engineers
BRC	below regulatory concern as defined in IDAPA 58.01.01.221.01
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
GMAW	gas metal arc welding
gph	gallons per hour
gpd	gallons per calendar day
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HDI	hexamethylene diisocyanate
HVLP	high volume, low-pressure
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MDI	methylenediphenyl diisocyanate
MFHAP	metal fabrication and finishing hazardous air pollutants as defined in 40 CFR 63.11522
MIG	metal inert gas welding
MMBtu	million British thermal units
MSDS	Material Safety Data Sheets
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
POM	polycyclic organic matter
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
PW	process weight rate
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TIG	tungsten inert gas
VOC	volatile organic compounds
WEMP	Welding Emissions Management Plan

## **FACILITY INFORMATION**

### ***Description***

Ground Force Manufacturing manufactures custom-designed equipment for mining support operations. The Post Falls facility has two operations on adjacent properties: Surface Force, located at 6001 E. Seltice Way, Post Falls, Kootenai, ID 83854, and Underground Force, located at 5650 E. Seltice Way, Post Falls, ID 83854.

### ***Surface Force:***

Steel is initially prepped in the shear-and-brake area, where it is cut with a plasma cutter using electricity and air. The equipment is assembled in the fabrication shop, where thirty portable electric welders are in operation. The facility also operates one portable tungsten inert gas (TIG) welder for small component processing, and a portable electric plasma cutter on an as-needed basis.

Once assembly is complete, the equipment proceeds to the paint shop, which consists of a wash-and-prep bay, paint mix and storage, a small paint booth for small components, and a Large Paint Booth for chassis and major assembly. The wash-and-prep bay uses a natural gas-heated, high-pressure soap and water solution. An electric burner vaporizes the used natural gas heated water and exhausts outside.

All painting, priming, and touch-up is performed in an enclosed paint booth. The air into each paint booth is preheated using natural gas. The small paint booth is a downdraft design. The large paint booth is a semi-down cross-draft design. The small paint booth exhausts through one filter. The large paint booth exhausts through a primary set of eight filters and a secondary set of 48 filters (six per filter housing).

The last step is final assembly. All components are assembled, any decals are applied, final inspection is completed, and equipment is prepared for shipment.

The facility conducts manufacturing operations Monday through Thursday, but can extend to Friday and Saturday or nights for limited duration to meet increased production demand.

### ***Underground Force:***

Steel is initially prepped in the shear and brake area, where it is cut with a plasma cutter using electricity and air. The equipment is assembled in the fabrication shop where fifteen stationary electric welders are in operation. The welders use BlueShield, a combination of 75% argon, and 25% carbon dioxide, which is piped to the welders from a central group of sixteen tanks. The facility also operates four portable electric welders, one portable TIG welder, and a portable plasma cutter in the fabrication shop on an as-needed basis. Structural safety testing to applicable ISO standards is conducted on the equipment outside of the fabrication shop.

Once assembly is complete, the equipment proceeds to the prep bay, where steam cleaning occurs in preparation for painting. The steam-cleaning bay is an enclosed building, and incorporates a burner to heat wash water. The burner is vented outside. Some small parts and tools are cleaned in a small, fully enclosed bead blaster in the maintenance shed.

All painting, priming, and touch-up is performed in an enclosed paint booth. The air into the paint booth is preheated using natural gas. The booth operates under negative pressure, ventilated through the floor. The exiting air is vented through the wall filter, then the "chicken coop" filter, which is at ground level at the southeast corner of the paint booth. The chicken coop vents through two filters, one each on the south and east sides. Painting materials are stored in an adjacent building that has two floor vents for breathing losses and temperature control. Thinner is recycled for reuse adjacent to the building, with a roof cover.

The last step is final assembly. All components are assembled, any decals are applied, final inspection is completed, and equipment is prepared for shipment.

The facility conducts manufacturing operations Monday through Thursday, with Friday and Saturday reserved for plant maintenance and inspection.

### ***Permitting History and Application Scope***

The Applicant has proposed to add a new coating product, Turbo Liner 11, to the list of approved coatings in the permit. No other changes are proposed by the Applicant as a result of this project.

### ***Application Chronology***

August 3, 2015	DEQ received an application and an application fee.
August 21, 2015	DEQ determined that the application was complete.
August 25 to Sept, 9, 2015	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
September 30, 2015	DEQ made available the draft permit and statement of basis for peer and regional office review.
October 15, 2015	DEQ made available the draft permit and statement of basis for applicant review.
October 20, 2015	DEQ received the permit processing fee.
October 22, 2015	DEQ issued the final permit and statement of basis.

# TECHNICAL ANALYSIS

## Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Regulated Sources	Control Equipment	Process Step	Location
<u>Coating equipment, or equivalent</u> <sup>(a)</sup> <i>Small paint booth with low-NO<sub>x</sub> heater</i> Date installed: 1985 Heat input capacity: ≤ 0.922 MMBtu/hr Fuel: natural gas only  <i>Large paint booth with low-NO<sub>x</sub> heater</i> Date installed: 1985 Heat input capacity: ≤ 4.55 MMBtu/hr Fuel: natural gas only  <i>Spray guns</i> <sup>(a)</sup> Manufacturer: Iwata Models: LPH 200-LVP & 400-LVX Max. capacity: 4 gph, 1.9 gph	<u>Filtration or equivalent</u> <sup>(b)</sup> Manufacturer: Fiberbond Model: E.P. Red Media Control efficiency: 99.8% of PM	Prime and Paint	Surface Force
<u>Welding equipment, or equivalent</u> <sup>(a)</sup> Stationary plasma cutter Portable electric plasma cutter 30 Portable electric welders Portable TIG welder 6 Portable electric welders 2 Electric cut off saws	Reasonable controls	Shear and Brake, Fabrication, Component Assembly, or Final Assembly	
Natural gas-fired pressure washer <sup>(a)</sup>	None	Wash and Prep	
Electric water evaporator <sup>(a)</sup>	Reasonable controls		
Machining and grinding equipment	Reasonable controls	Shear and Brake, Fabrication, or Final Assembly	

Regulated Sources	Control Equipment	Process Step	Location
<u>Coating equipment, or equivalent</u> <sup>(a)</sup> <i>Paint booth with low-NO<sub>x</sub> heater</i> Date installed: 1989 Heat input capacity: ≤ 0.32 MMBtu/hr Fuel: natural gas only  <i>Spray guns</i> <sup>(a)</sup> Manufacturer: Iwata Models: LPH 200-LVP & 400-LVX Max. capacity: 4 gph, 1.9 gph	<u>Filtration or equivalent</u> <sup>(b)</sup> Manufacturer: Fiberbond Model: E.P. Red Media Control efficiency: 99.8% of PM	Prime and Paint	Underground Force
<i>Paint Storage</i>	Reasonable controls	Final Assembly	
<u>Welding equipment, or equivalent</u> <sup>(a)</sup> Stationary plasma cutter 2 portable plasma cutters Portable electric plasma cutter Portable TIG welder 4 Portable electric welders 15 Stationary electric welders	Reasonable controls	Shear and Brake, Fabrication, or Final Assembly	
<u>Maintenance Shop Bead Blaster, or equivalent</u> <sup>(a)</sup>	Reasonable controls	Fabrication	
<u>Pressure washer, or equivalent</u> <sup>(a)</sup>	None	Wash and Prep	
Machining and grinding equipment	Reasonable controls	Shear and Brake, Fabrication, or Final Assembly	

(a) "or equivalent" equipment is defined as equipment which has an equivalent or less maximum capacity, equivalent or lower pollutant emission rates (whether calculated based on maximum design capacity or based on established permit limits), and which does not result in an emission increase as defined in IDAPA 58.01.01.007, or in the emission of any regulated air pollutant not previously emitted. The number of spray booths, spray guns, cutters, welders, saws, pressure washers, and water evaporators at the facility is not limited as long as the permittee can demonstrate equivalency to DEQ.

(b) "or equivalent" equipment is defined as equipment which has an equivalent or greater control efficiency, equivalent or lower pollutant emission rates (whether calculated based on maximum design capacity or based on established permit limits), and which does not result in an emission increase as defined in IDAPA 58.01.01.007, or in the emission of any regulated air pollutant not previously emitted. The number of spray booths, spray guns, cutters, welders, saws, pressure washers, and water evaporators at the facility is not limited as long as the permittee can demonstrate equivalency to DEQ.

## ***Emission Inventories***

### **Potential to Emit**

IDAPA 58.01.01.006 defines potential to emit (PTE) as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the PTE of a facility or stationary source.

### **Uncontrolled Potential to Emit**

Uncontrolled potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled potential to emit is used to determine if a facility is a “synthetic minor” source of emissions. Synthetic minor sources are facilities that have an uncontrolled potential to emit for a criteria pollutant or HAP above an applicable major source threshold without permit limits.

There was no change in emissions proposed by the Applicant for this project. The Applicant has only proposed adding an additional coating product, Turbo Liner 11, to the list of approved coatings in the permit. Therefore, see the Statement of Basis for P-2014.0024, project 61364 dated November 5, 2014, for the Uncontrolled Potential to Emit for this facility.

### **Pre-Project Potential to Emit**

This is an existing facility. Therefore, see the Statement of Basis for P-2014.0024, project 61364 dated November 5, 2014, for the Pre-Project Potential to Emit for this facility.

### **Post Project Potential to Emit**

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility’s classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project. As discussed previously, there was no change in emissions proposed by the Applicant for this project. The Applicant has only proposed adding an additional coating product, Turbo Liner 11, to the list of approved coatings in the permit. Therefore, see the Statement of Basis for P-2014.0024, project 61364 dated November 5, 2014, for the Post Project Potential to Emit for this facility.

### **Change in Potential to Emit**

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. As discussed previously, there was no change in emissions proposed by the Applicant for this project. The Applicant has only proposed adding an additional coating product, Turbo Liner 11, to the list of approved coatings in the permit. Therefore, the change in Potential to Emit for this project is zero for all criteria pollutant emissions.

### Non-Carcinogenic TAP Emissions

As discussed previously the Applicant has proposed to add a new coating product, Turbo Liner 11, to the list of approved coatings in the permit. Turbo Liner 11 only contains one non-carcinogenic TAP, Methylenediphenyl diisocyanate (MDI). No other changes are proposed by the Applicant as a result of this project. A summary of the estimated PTE for emissions increase of non-carcinogenic toxic air pollutants (TAP) is provided in the following table.

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

**Table 2 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS**

Non-Carcinogenic Toxic Air Pollutants	Pre-Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Methylenediphenyl diisocyanate (MDI)	0.00E-03	2.14E-03	0.0021	0.003	No

None of the PTEs for non-carcinogenic TAP were exceeded as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average carcinogenic screening ELs identified in IDAPA 58.01.01.585 were exceeded.

### Carcinogenic TAP Emissions

There was no change in carcinogenic TAP emissions proposed as a result of this project.

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

As discussed previously, the only modification to the permit is to add a new coating product, Turbo Liner 11, to the list of approved coatings in the permit. No other changes are proposed by the Applicant as a result of this project. In addition, there were no proposed increases in criteria pollutants and the only increase in emissions was for Methylenediphenyl diisocyanate (MDI). As discussed previously, modeling was not required for this non-carcinogenic TAP. Therefore, an ambient air quality impact analysis was not required to be performed for this project.

## **REGULATORY ANALYSIS**

### **Attainment Designation (40 CFR 81.313)**

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

### **Facility Classification**

The AIRS/AFS facility classification codes are as follows:

For THAPs (Total Hazardous Air Pollutants) Only:

- A = Use when any one HAP has actual or potential emissions  $\geq 10$  T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions  $\geq 25$  T/yr.
- SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits  $\geq 8$  T/yr of a single HAP or  $\geq 20$  T/yr of THAP.
- SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to  $< 8$  T/yr of a single HAP and/or  $< 20$  T/yr of THAP.

- B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold
- UNK = Class is unknown

For All Other Pollutants:

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

**Table 3 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION**

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	<100	<100	100	B
PM <sub>10</sub> /PM <sub>2.5</sub>	<100	<100	100	B
SO <sub>2</sub>	<100	<100	100	B
NO <sub>x</sub>	<100	<100	100	B
CO	<100	<100	100	B
VOC	<100	<100	100	SM
HAP (single)	>10	<10	10	SM
HAP (Total)	>25	<25	25	SM

**Permit to Construct (IDAPA 58.01.01.201)**

IDAPA 58.01.01.201 Permit to Construct Required

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

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

IDAPA 58.01.01.401 Tier II Operating Permit

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

**Visible Emissions (IDAPA 58.01.01.625)**

IDAPA 58.01.01.625 Visible Emissions

The sources of PM<sub>10</sub> emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.1 and 2.2.

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

IDAPA 58.01.01.301

Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for all criteria pollutants or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

**PSD Classification (40 CFR 52.21)**

40 CFR 52.21

Prevention of Significant Deterioration of Air Quality

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

**NSPS Applicability (40 CFR 60)**

The facility is not subject to any NSPS requirements.

**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 is subject to the NESHAP requirements of 40 CFR 63, Subpart XXXXXX for metal fabrication and finishing sources. A federal regulation review and applicability form (FRA) was included in the previous application for this facility. Therefore, see the Statement of Basis for P-2014.0024, project 61364 dated November 5, 2014, for the 40 CFR 63, Subpart XXXXXX, review and applicability.

**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 SCOPE**

Permit Condition 1.1 describes the addition of the new coating material proposed for this project.

Permit Condition 1.3 explains which previous permit for the facility is being replaced as a result of this project.

**COATING**

Permit Condition 3.1 was added to the permit to include the coating process description.

**WELDING**

Permit Condition 4.1 was added to the permit to include the welding process description.

**DRY ABRASIVE BLASTING**

Permit Condition 5.1 was added to the permit to include the dry abrasive blasting process description.

**MACHINING AND GRINDING**

Permit Condition 6.1 was added to the permit to include the machining and grinding process description.

## ***APPENDIX A – SPRAY COATING MATERIALS***

Turbo Liner 11 was added to list of approved spray coating hardeners, filers, and liners that may be used at the facility.

## **PUBLIC REVIEW**

### ***Public Comment Opportunity***

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c. During this time, there was no request for a public comment period on DEQ's proposed action. Refer to the Application Chronology section for public comment opportunity dates.

## APPENDIX A – FACILITY DRAFT COMMENTS

**The following comments were received from the facility on October 19, 2015:**

**Facility Comment:** Under Hardeners fillers and Liners we had requested 5.75 Hours per day or 20 gallons of Hardeners Fillers and liners.

**DEQ Response:** After discussing this comment with the facility and examining the application it was clear that the facility had not requested 20 gal/day of hardeners, fillers, and liners nor proposed a criteria pollutant emissions increase for the project. Therefore, the requested change was not made to the permit.

**APPENDIX B – PROCESSING FEE**

## PTC Fee Calculation

**Instructions:**

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

**Company:** Ground Force Mfg.  
**Address:** 5650 E. Seltice Way  
**City:** Post Falls  
**State:** ID  
**Zip Code:** 83854  
**Facility Contact:** Roy Murdock  
**Title:** Facility permitting contact  
**AIRS No.:** 055-00122

- N** Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
- Y** Did this permit require engineering analysis? Y/N
- N** Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

<b>Emissions Inventory</b>			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO <sub>x</sub>	0.0	0	0.0
SO <sub>2</sub>	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
TAPS/HAPS	0.0	0	0.0
<b>Total:</b>	<b>0.0</b>	<b>0</b>	<b>0.0</b>
Fee Due	<b>\$ 1,000.00</b>		

Comments: