



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, ID 83706 • (208) 373-0502
www.deq.idaho.gov

Brad Little, Governor
John Tippetts, Director

July 15, 2020

Kevin Bennett, Operations Manager
Interstate Group LLC
605 N. 39th St.
Nampa, ID 83687

RE: Facility ID No. 027-00153, Interstate Group LLC, Nampa
Final Permit Letter

Dear Mr. Bennett:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2016.0032 Project 62421 to Interstate Group LLC located at Nampa for the permit modification to increase coating usage. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received April 6, 2020.

This permit is effective immediately and replaces PTC No. P-2016.0032 issued on September 26, 2016. This permit does not release Interstate Group LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard, Boise, ID 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with David Luft, Air Quality Manager, at (208) 373-0201 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Kelli Wetzel at (208) 373-0502 or kelli.wetzel@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Bureau Chief
Air Quality Division

MS\kw

Permit No. P-2016.0032 PROJ 62421

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Interstate Group LLC
Permit Number P-2016.0032
Project ID 62421
Facility ID 027-00153
Facility Location 605 N. 39th St.
Nampa, ID 83687

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued July 15, 2020



Kelli Wetzel, Permit Writer



Mike Simon, Stationary Source Bureau Chief

Contents

1	Permit Scope.....	3
2	Facility-Wide Conditions.....	4
3	Paints and Coatings.....	7
4	General Provisions.....	16

1 Permit Scope

Purpose

- 1.1 This is a modified permit to construct (PTC) to increase the use of an already permitted topcoat, limit the use of a new primer, and reduce the monthly use limits of two already permitted coatings.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2016.0032 issued on September 26, 2016.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	<u>Makeup Air Unit</u> Rated Capacity: 1.925 MMBtu/hr Allowable fuel type: natural gas	None
2	<u>Ten Unit Heaters</u> Rated Capacity: 0.035 MMBtu/hr each Allowable fuel type: natural gas only	None
3	<u>Painting Operations Paint Booth</u> HVLV spray gun transfer efficiency: 65% Rated Capacity: 4.7 gal/hr	Fiberglass Exhaust Filters PM ₁₀ control efficiency: 98.65%
3	<u>Undercoating Paint Booth</u> Airless spray gun transfer efficiency: 40%	Fiberglass Exhaust Filters PM ₁₀ control efficiency: 96%

2 Facility-Wide Conditions

Fugitive Dust Emissions

2.1 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts. Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

2.2 Responsible Control Measures

The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

The permittee shall conduct a weekly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

2.3 Odors

In accordance with IDAPA 58.01.01.776.01, the permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution.

2.4 Odor Complaints

The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

2.5 Opacity Limit

Emissions from any stack, vent, or functionally equivalent opening associated with the trailer manufacturing process, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.6 Visible Emissions Inspections

The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Fuel-Burning Equipment

2.7 Emission Limit

The permittee shall not discharge to the atmosphere from any fuel burning equipment with a maximum rated input of less than ten million BTU per hour , PM in excess of 0.015 gr/dscf corrected to 3% oxygen, in accordance with IDAPA 58.01.01.676-677.

2.8 Fuel Type Restriction

All fuel burning equipment listed in Table 1.1 shall be fired on natural gas exclusively.

Reports and Certifications

2.9 Reporting Requirement

Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N Orchard
Boise, Idaho 83706
Phone: (208) 373-0550
Fax: (208) 373-0287

Obligation to Comply

2.10 Compliance Requirement

Receiving a PTC shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations. The permittee shall document compliance with the Rules when using new materials containing new toxic air pollutants (TAP) or hazardous air pollutants (HAP).

3 Paints and Coatings

3.1 Process Description

Over-the-road trailers of various sizes are welded, painted in a paint booth, finished with a plywood floor and interior surfaces and trim, and the frame is undercoated.

3.2 Control Device Descriptions

Table 3.1 Paints and Coatings Description

Emissions Units / Processes	Control Devices
Painting Operations Paint Booth HVLP spray gun transfer efficiency: 65% Rated Capacity: 4.7 gal/hr	Fiberglass Exhaust Filters PM ₁₀ control efficiency: 98.65%
Undercoating Paint Booth Airless spray gun transfer efficiency: 40%	Fiberglass Exhaust Filters PM ₁₀ control efficiency: 96%

Emission Limits

3.3 Emission Limits

The PM₁₀ and VOC emissions from the painting operations paint booth and the undercoating paint booth shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Painting Operations Emission Limits^(a)

Source Description	PM ₁₀ ^(b)		VOC		Individual HAP ^(d)	Total HAP ^(e)
	lb/mo	T/yr ^(c)	lb/mo	T/yr ^(c)	T/yr	T/yr
Painting Operations Paint Booth	30.0	0.18	4,104	24.63	9.8	15.9
Undercoating Paint Booth	55.0	0.33	882	5.2		

- a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b) 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.
- c) Tons per any consecutive 365-day period.
- d) Emission limit for each single hazardous air pollutant (HAP).
- e) Emission limit for total of all HAP (combined).

[07/15/2020]

Operating Requirements

3.4 VOC Emissions Calculations

The permittee shall monitor and record VOC emissions on monthly basis to demonstrate compliance with the Emission Limits permit condition. The monthly calculations shall be made in lb/mo and converted to T/yr. Annual emissions calculations shall represent any consecutive 12 month period. The VOC emissions shall be calculated using the following equation:

$$VOC = \sum_{i=1}^n (X_i \times Y_i)$$

Where:

- VOC = Emissions of VOC per month and year (lb/mo, T/yr)
- n = Number of compounds used
- X_i = Usage of compound i per month and year (lb/mo, T/yr)
- Y_i = Weight percent of VOC contained in compound i

Note: *Compound* refers to any paint, adhesive, solvent, or any other solid containing chemicals.

3.5 PM₁₀ Emissions Calculations

The permittee shall monitor and record PM/PM₁₀ emissions on a monthly basis to demonstrate compliance with the Emission Limits permit condition. The monthly calculations shall be made in lb/mo and converted to T/yr. Annual emissions calculations shall represent any consecutive 12 month period. The PM and PM₁₀ emissions shall be calculated using the following equation:

$$PM = \left(\sum_{i=1}^n [i \times p] \right) \times TE \times FE$$

Where:

- PM = Emissions of particulate matter PM or PM₁₀ per month and year (lb/mo, T/yr)
- i = Usage of compound i per day and/or per year (lb/day, T/yr)
- n = Number of compounds used
- p = percent solids by weight in compound i (% solids)
- TE = 40% (0.60) transfer efficiency for undercoating or 35% (0.65) transfer efficiency in paint booth
- FE = 96% (0.04) filter efficiency for undercoating or 98.65% (0.0135) filter efficiency in paint booth

Note: *Compound* refers to any paint, adhesive, solvent, or any other solid containing chemicals.

3.6 Approved Monthly Coating Usage Limits

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:

Table 3.3 Monthly Coating Usage Limits

Coating Material	Monthly Coating Usage Limit
	(gal/mo)
Z Guard 1021FRX	350
Sherwin Williams Black Paint (Kem 400) or Asphalt Co. 9900 Paint	500
LaVanture Products Adhesive White/Black	100
Henkel Quad Sealant Clear	65
Henkel Quad Sealant White	50
Walmart Black Spray	50
Rust-Oleum Silver Spray	50
Sherwin Williams Touch-Up Paint	3
Henkel Almond (LOS PSS 10.00Z ACWS ALM 12 CC)	50

Coating Material	Monthly Coating Usage Limit
	(gal/mo)
Hi-Tech Industries Silicone (Project 1)	50
Sherwin Williams Xylene Solvent	10
Sherwin Williams Mineral Spirits	50
Asphalt Co. 9970 Primer	50
Hi-Lite Solutions AeroGreen Paint Prep	50
Columbia Interior Wall Paint/Floor Paint	40
Sherwin Williams acetone or Columbia Gray Primer	10
Sherwin Williams Kem Flash 500 Light Gray (Kem 500)	100

[07/15/2020]

3.7 Spray Gun and Filter System

The permittee shall install, maintain, and operate according to the manufacturer's specifications and recommendations, a spray booth filter system with a minimum control efficiency of 98.65% within the painting operations paint booth and 96% within the undercoating booth as documented by the filter manufacturer.

All painting inside the painting operations paint booth shall be conducted with a HVLP spray gun, or equivalent technology, with a minimum 65% transfer efficiency as documented by the spray gun manufacturer.

Alternate Daily Coating Usage Scenarios

Unless using an Approved Daily Coating Usage Scenario for which compliance has previously been determined in Table 3.3, such as when new or reformulated coating materials are introduced, each day before coating materials are used the permittee shall follow the procedures of this section. The permittee shall not use any new Daily Coating Usage Scenario until Coating TAP compliance and Coating Emission Limit compliance have been demonstrated for that Scenario according to the following permit conditions.

3.8 Propose a Daily Coating Usage Scenario

Prior to using or implementing a new Daily Coating Usage Scenario review the following:

- The permittee shall propose and record maximum daily coating usage limits for each coating material that will be used in the Scenario, in gallons per day (gal/day). The permittee shall not use or implement any Scenario that does not have recorded maximum daily coating usage limits.
- The permittee shall estimate emissions of PM₁₀/PM_{2.5}, VOC, individual HAP, total HAP, and all TAP listed in Table 3.4 for the Scenario (lb/day for each pollutant), using the procedures described below for estimating emissions.
- The permittee shall demonstrate coating TAP compliance for the Scenario, using the procedures described below for demonstrating coating TAP compliance. The permittee shall not use or implement any Scenario that does not demonstrate coating TAP compliance.

- The permittee shall demonstrate Coating Emission Limit compliance for the Scenario, using the procedures described below for demonstrating Coating Emission Limit compliance. The permittee shall not use or implement any Scenario that does not demonstrate Coating Emission Limit compliance.
- The daily coating usage limits and emission estimates used in determining coating TAP compliance and Coating Emission Limit compliance shall be based on estimated emissions from all coatings to be used from all coating operations at the facility (i.e., facility-wide).

[07/15/2020]

3.9 Estimate Coating TAP Emissions

TAP emissions shall be estimated for all TAP listed in Table 3.4:

- Emissions shall be estimated by multiplying each maximum daily coating usage rate (gal/day) by the TAP content (lb/gal) of that coating, and summing the total emissions from all coating materials (lb/day). TAP emissions which are designated as a particulate in Table 1.4 may also be multiplied by one minus the documented spray gun transfer efficiency and by one minus the documented filtration system control efficiency when control equipment will be applied to such emissions. Alternatively, for isocyanate-based “iso” materials such as those used in 2-part urethane systems, isocyanate-based TAP emissions may instead be multiplied by one minus the documented spray gun transfer efficiency and by 15% to account for the isocyanate reaction.
- TAP content (lb/gal) of a coating is specified on the Safety Data Sheet (SDS) for that coating, or shall be calculated by multiplying the weight percentage of TAP (%) by the density (lb/gal) of the coating from the SDS.
- For TAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the TAP content is listed as below detection on SDS or other documentation, the TAP content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.
- When the TAP content cannot be determined from SDS or other documentation, the TAP content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.

[07/15/2020]

3.10 Demonstrate Coating TAP Compliance

For each Daily Coating Usage Scenario, the permittee shall estimate TAP emissions from all coating operations and compare against the TAP Screening Emission Rates or Modeled Concentration Limits in Table 3.4:

- The permittee shall compare estimated TAP emissions for all coatings against the Screening Emission Rates in Table 1.4. For emissions equal or less than the Screening Emission Rate, modeling analyses is not required. For emissions in excess of the Screening Emission Rate, modeling analyses is required to determine the maximum modeled concentration.

- Modeled emissions from all coating operations for a Daily Coating Usage Scenario shall not exceed the Modeled Concentration Limits in Table 3.4. The permittee shall not use or implement any Scenario that exceeds a Modeled Concentration Limit.
- All modeling analyses shall use EPA-approved models and follow relevant guidance in the most recent version of the “State of Idaho Guideline for Performing Air Quality Impact Analyses,” available for download at DEQ’s website.

Table 3.4 TAP Screening Emission Rates and Modeled Concentration Limits ^(a)

TAP	CAS	Particulate?	HAP?	Screening Emission Rate (lb/day) ^(b)	Modeled Concentration Limit (mg/m ³) ^(c)
Acetone	67-64-1	No	No	2856	89
Acetaldehyde	75-07-0	No	Yes	0.072	0.00045
Acrylamide	79-06-1	No	Yes	0.0001224	0.00000077
Acrylic Acid	79-10-7	No	Yes	48	1.5
Aluminum - Metal and Oxide	7429-90-5	Yes	No	16.008	0.5
Aluminum - Soluble Salts	7429-90-5	Yes	No	3.192	0.1
n-Amyl Acetate	628-63-7	No	No	847.2	26.5
Antimony	7440-36-0	Yes	Yes	0.792	0.025
Barium	7440-39-3	Yes	No	0.792	0.025
Benzene	71-43-2	No	Yes	0.0192	1.20E-04
Benzo(a)pyrene	50-32-8	No	Yes	0.000048	3.0E-07
Benzoyl Peroxide	94-36-0	No	No	7.992	0.25
Bis (2-Ethylhexyl) Phthalate (DEHP)	117-81-7	No	Yes	0.672	0.0042
2-Butoxyethanol (EGBE; Ethylene Glycol Monobutyl Ether)	111-76-2	No	No	192	6
2-Butoxyethyl Acetate	112-07-2	No	Yes	199.92	1.25
n-Butyl Acetate	123-86-4	No	No	1135.2	35.5
tert-Butyl Acetate	540-88-5	No	No	1519.2	47.50
n-Butyl Alcohol	71-36-3	No	No	240	7.5
Sec-Butyl Alcohol (2-Butanol)	78-92-2	No	No	487.2	15.25
Butyl Hydroxytoluene (2,6-Di-tert-butyl-p-cresol)	128-37-0	No	No	16.008	0.5
Calcium Carbonate (Limestone)	1317-65-3	Yes	No	16.008	0.5
Calcium Sulfate (Gypsum)	13397-24-5	Yes	No	16.008	0.5
Carbon Black	1333-86-4	Yes	No	5.52	0.175
Carbon Tetrachloride	56-23-5	No	Yes	0.01056	0.000067
Chloroform	67-66-3	No	Yes	0.00672	0.000043
Chromium	7440-47-3, 16065-83-1	Yes	Yes	0.792	0.025
Chromium (VI)	18540-29-9	Yes	Yes	0.00001344	8.3E-08
Cobalt	7440-48-4	Yes	Yes	0.0792	0.0025
Copper	7440-50-8	Yes	No	1.608	0.05
Cumene	98-82-8	No	Yes	391.2	12.25
Cyclohexane	110-82-7	No	No	1680	52.5
Cyclohexanone	108-94-1	No	No	160.08	5
Diacetone Alcohol	123-42-2	No	No	384	12
Dibutyl Phthalate (DBP)	84-74-2	No	Yes	7.992	0.25
1,4-Dichlorobenzene	106-46-7	No	Yes	720	22.5
o-Dichlorobenzene	95-50-1	No	No	480	15
Diethyl Phthalate	84-66-2	No	No	7.992	0.25
Diisobutyl Ketone	108-83-8	No	No	232.08	7.25
Dimethylphthalate (DMP)	131-11-3	No	Yes	7.992	0.25
Diphenyl (Biphenyl)	92-52-4	No	Yes	2.4	0.075
Dipropylene Glycol Methyl Ether	34590-94-8	No	No	960	30
Ethanolamine (2-Aminoethanol; Monoethanolamine)	141-43-5	No	No	12.792	0.4
Ethyl Acetate	141-78-6	No	No	2239.2	70
Ethyl Alcohol	64-17-5	No	No	3000	94

				Screening Emission Rate	Modeled Concentration Limit
TAP	CAS	Particulate?	HAP?	(lb/day) ^(b)	(mg/m ³) ^(c)
Ethyl Benzene	100-41-4	No	Yes	696	21.75
Ethylene Glycol	107-21-1	No	Yes	20.304	6.35
Ethylenediamine (1,2-Diaminoethane)	107-15-3	No	No	40.08	1.25
Formaldehyde	50-00-0	No	Yes	0.01224	7.70E-05
Furfuryl Alcohol	98-00-0	No	No	64.08	2
Heptane (n-Heptane)	142-82-5	No	No	2616	82
Hexamethylene Diisocyanate ^(d)	822-06-0	No	Yes	0.048	0.0015
Hexane (n-Hexane)	110-54-3	No	Yes	288	9
Hydroquinone	123-31-9	No	Yes	3.192	0.1
Iron Oxide (Fe ₂ O ₃)	1309-37-1	Yes	No	7.992	0.25
Isobutyl Acetate	110-19-0	No	No	1120.8	35
Isobutyl Alcohol	78-83-1	No	No	240	6
Isophorone Diisocyanate	4098-71-9	No	No	0.144	0.0045
Isopropyl Alcohol (Isopropanol)	67-63-0	No	No	1567.2	49
Isopropyl Acetate	108-21-4	No	No	1663.2	52
Kaolin	1332-58-7	Yes	No	3.192	0.1
Lead	7439-92-1	Yes	Yes	0.328	0.00015
Manganese	7439-96-5	Yes	Yes	7.992	0.25
Magnesite (Magnesium Carbonate)	546-93-0	Yes	No	16.008	0.5
Methacrylic Acid	79-41-4	No	No	112.08	3.5
Methanol	67-56-1	No	Yes	415.2	13
1-Methoxy-2-Propanol Acetate (PGMEA)	108-65-6	No	No	576	3.6
2-Methoxyethyl Acetate (EGMEA; Ethylene Glycol Monomethyl Ether Acetate)	110-49-6	No	Yes	38.4	1.2
Methyl Acetate	79-20-9	No	No	976.8	30.5
Methyl n-Amyl Ketone (Heptan-2-one)	110-43-0	No	No	376.8	11.75
Methyl Chloroform	71-55-6	No	Yes	3048	95.5
Methyl Ethyl Ketone (MEK)	78-93-3	No	No	943.2	29.5
Methyl Isoamyl Ketone	110-12-3	No	No	384	12
Methyl Isobutyl Carbinol	108-11-2	No	No	166.32	5.2
Methyl Isobutyl Ketone (MIBK)	108-10-1	No	Yes	328.8	10.25
Methyl Methacrylate	80-62-6	No	Yes	655.2	20.5
o-Methylcyclohexanone	583-60-8	No	No	367.2	11.5
Methylene Bis (4-Cyclohexyl Isocyanate) (H12MDI; Dicyclohexylmethane 4,4'-Diisocyanate) ^(d)	5124-30-1	No	No	0.168	0.0055
Methylene Chloride (Dichloromethane)	75-09-2	No	Yes	0.0384	2.40E-04
Methylene Diisocyanate (MDI; 4,4'-Diphenylmethane Diisocyanate) ^(d)	101-68-8	No	Yes	0.072	0.0025
Methyl Propyl Ketone (2-Pentanone)	107-87-9	No	No	1120.8	35
Mica	12001-26-2	Yes	No	4.8	0.15
Molybdenum	7439-98-7	Yes	No	7.992	0.25
Naphthalene	91-20-3	No	Yes	79.92	2.5
Nickel	7440-02-0	Yes	Yes	0.000648	4.20E-06
Nonane	111-84-2	No	No	1680	52.5
Pentane	109-66-0	No	No	2832	88.5
Phenol	108-95-2	No	Yes	30.48	0.95
Phosphoric Acid	7664-38-2	No	No	1.608	0.05
Portland Cement	65997-15-1	Yes	No	16.008	0.5
Propionic Acid	79-09-4	No	No	48	1.5
n-Propyl Acetate	109-60-4	No	No	1344	42
Propyl Alcohol	71-23-8	No	No	799.2	25
Selenium	7782-49-2	Yes	Yes	0.312	0.01

TAP	CAS	Particulate?	HAP?	Screening Emission Rate (lb/day) ^(b)	Modeled Concentration Limit (mg/m ³) ^(c)
Silica – Amorphous, including: • Diatomaceous Earth (uncalcined) • Precipitated Silica • Silica Gel	61790-53-2 112926-00-8	Yes	No	16.008	0.5
Silica - Crystalline - Cristobalite	14464-46-1	Yes	No	0.0792	0.0025
Silica - Crystalline Quartz & Fused Silica	14808-60-7	Yes	No	0.1608	0.005
Silicon Tetrahydride (Silane)	7803-62-5	No	No	11,208	0.35
Sodium Hydroxide (Caustic Soda)	1310-73-2	No	No	3.192	0.1
Stoddard Solvent	8052-41-3	No	No	840	26.25
Styrene	100-42-5	No	Yes	160.08	1
Tert-Butyl Acetate	540-88-5	No	No	1519.2	47.5
Tetrachloroethylene (PCE; Perchloroethylene)	127-18-4	No	Yes	0.312	0.0021
Tetrahydrofuran	109-99-9	No	No	943.2	29.5
Toluene	108-88-3	No	Yes	600	18.75
Trichloroethylene (TCE)	79-01-6	No	Yes	0.01224	0.00077
Triethylamine	121-44-8	No	Yes	6.48	0.2
Trimethyl Benzene (Mixed and Individual Isomers)	25551-13-7	No	No	196.8	6.15
2,2,4-Trimethylpentane	540-84-1	No	Yes	559.2	17.5
Vinyl Acetate	108-05-4	No	Yes	55.2	1.75
Vinyl Chloride	75-01-4	No	Yes	0.02256	0.00014
Vinyl Toluene (Methylstyrene)	25013-15-4	No	No	384	12
VM&P Naphtha (Petroleum Ether; Ligroin)	8032-32-4	No	No	2191.2	68.5
Xylene (o-, m-, p-isomers)	1330-20-7	No	Yes	696	21.75
Zinc	7440-66-6	Yes	No	16.008	0.5
Zinc Oxide	1314-13-2	Yes	No	16.008	0.5
Zirconium	7440-67-7	Yes	No	7.992	0.25

- If an alternate coating is introduced and contains an IDAPA 58.01.01.585-586 substance that is not listed in this table, compliance with each screening emission rate and modeled concentration limit in IDAPA 58.01.01.585-586 shall be demonstrated.
- Worst-case pounds of emissions from all coating operations (combined) per day, as calculated using procedures in this permit to estimate TAP emissions, or as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.
- Milligrams of toxic air pollutant (TAP) per cubic meter, modeling proposed emission rates calculated using a daily averaging period.
- Isocyanate-based TAP for the purposes of estimating coating TAP emissions (Permit Condition 3.9).

[07/15/2020]

3.11 Demonstrate Coating Emission Limit Compliance

For each Daily Coating Usage Scenario, the permittee shall estimate emissions from all coating operations and compare against the Coating Emission Limits in Table 3.2:

- Daily PM₁₀/PM_{2.5} emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the solids content (lb/gal) of that coating, and summing the total emissions from all coatings (lb/day). Emissions may also be multiplied by one minus the transfer efficiency and by one minus the filter control efficiency when control equipment will be applied to such emissions. Emissions from isocyanate-based “iso” coating materials (Table 3.4) used in 2-part urethane systems may be multiplied by 15% to account for material applied, consumed in the reaction, and captured by filtration.
- Daily VOC emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the VOC content (lb/gal) for that coating material, and summing the total emissions from all coating materials (lb/day).
- Daily HAP emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the HAP content (lb/gal) for each coating material, and summing the total emissions from all coating materials (lb/day).

- Annual PM₁₀/PM_{2.5}, VOC, and HAP emissions shall be determined by summing daily emissions (lb/day) over the previous consecutive 365-day period and dividing by 2000 pounds per ton (lb/T).
- For solids content, VOC content, and HAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the solids content, VOC content, or HAP content is listed as below detection on SDS or other documentation, the content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.
- When the solids content, VOC content, or HAP content cannot be determined from SDS or other documentation, the content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.
- The permittee shall compare estimated emissions for all coating materials against the Coating Emission Limits in Table 3.2. The permittee shall not use or implement any Scenario that exceeds a Coating Emission Limit.

[07/15/2020]

Monitoring and Recordkeeping Requirements

3.12 Coating Material Usage Recordkeeping

Each calendar day on which coating materials are used, the permittee shall collect and maintain records of the quantity of each material used, including but not limited to primers paint, adhesive, solvent, or cleaner materials to demonstrate compliance with Approved Alternate Daily Coating Usage Limits and Alternative Coating Usage Scenario requirements.

- If no Alternate Daily Coating Usage Scenarios were used in the calendar day, the monthly usage rates shall be compared against the Approved Monthly Coating Usage Limits. Annual usage shall be determined by summing monthly emissions over the previous consecutive 12-month period.
- If Alternate Daily Coating Usage Scenarios were used in the calendar day, emissions from all coatings shall be summed and compared against TAP screening emission rates using the estimation procedures provided in the Estimate Coating TAP Emissions permit condition, and compared against Coating Emission Limits using the estimation procedures provided in the Demonstrate Coating Emission Limit Compliance permit condition.
- Exceedances of Approved Monthly Coating Usage Limits shall be treated as excess emission event(s), and the permittee shall report these in accordance with the excess emission procedures and requirements provided in the General Provisions of this permit.

[07/15/2020]

3.13 Coating Usage Scenario Monitoring

Each calendar day on which an Alternate Coating Usage Scenario will be used, the permittee shall select and record the Daily Coating Usage Scenario that will be used for that day, and comply with the maximum daily coating usage limits specified for the selected Scenario.

- Only one Daily Coating Usage Scenario may be used each calendar day.
- The permittee shall not exceed any daily coating usage limit for the Scenario chosen that calendar day.
- The permittee shall maintain documentation such as coating material SDS, manufacturer's specification sheets that support filter control efficiencies, transfer efficiencies, capture efficiencies, and other engineering assumptions relied upon in emission calculations.

[07/15/2020]

3.14 Material Purchase Records and Safety Data Sheets

The permittee shall monitor and record the following information to demonstrate compliance with the emissions rate limits and operating requirements:

- Trade name and identification number, or similar, of each compound used
- Safety Data Sheets (SDS) for each compound used
- Number of each compound used
- The amount, expressed as the gallons purchased and received at the facility, of each compound used
- The calculated VOC and PM₁₀ emissions using the equations provided monthly and annually.

3.15 Coating Usage Scenario Reporting

Each year, for Coating Usage Scenarios that have not already been submitted, the permittee shall submit a report by May 1st on all unapproved Daily Coating Usage Scenarios used each calendar day during the previous 365-day period. The report shall include documentation supporting the TAP compliance demonstrations and the Coating Emission Limit compliance demonstrations relied upon for each Daily Coating Usage Scenario, and any modeling analyses conducted in each coating TAP compliance demonstration. Documentation should be in sufficient detail, including documentation of all calculations and electronic copies of modeling files, such that DEQ can verify the analysis. The report shall be titled "Permit-Required TAP Compliance Report" and shall be sent to:

DEQ State Office
Air Quality Division
1410 N. Hilton
Boise, ID 83706

[07/15/2020]

3.16 Recordkeeping

The permittee shall comply with the recordkeeping General Provision requirements.

4 General Provisions

General Compliance

4.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the “Rules for the Control of Air Pollution in Idaho.” The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the “Rules for the Control of Air Pollution in Idaho,” and the Environmental Protection and Health Act (Idaho Code §39-101, et seq).

[Idaho Code §39-101, et seq.]

4.2 The permittee shall at all times (except as provided in the “Rules for the Control of Air Pollution in Idaho”) maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/1994]

4.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/1994]

Inspection and Entry

4.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

4.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/1994]

4.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/1994]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/1994]

Performance Testing

- 4.7** If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 4.8** All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 4.9** Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/2000 and 4/11/2015]

Monitoring and Recordkeeping

- 4.10** The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/1994]

Excess Emissions

- 4.11** The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/2000]

Certification

- 4.12** All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/1994]

False Statements

- 4.13** No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/1998]

Tampering

- 4.14** No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/1998]

Transferability

- 4.15** This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/2006]

Severability

- 4.16** The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/1994]