

# **Statement of Basis**

**Permit to Construct No. P-2016.0032  
Project ID 62421**

**Interstate Group LLC  
Nampa, Idaho**

**Facility ID 027-00153**

**Final**

**July 15, 2020**

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**Permit Writer**

*KW*

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

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
Btu	British thermal units
CAA	Clean Air Act
CAS No.	Chemical Abstracts Service registry number
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	CO <sub>2</sub> equivalent emissions
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GACT	Generally Available Control Technology
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O <sub>2</sub>	oxygen
PAH	polyaromatic hydrocarbons
PC	permit condition
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
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
psig	pounds per square inch gauge
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit

PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
ULSD	ultra-low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compounds
yd <sup>3</sup>	cubic yards
µg/m <sup>3</sup>	micrograms per cubic meter

## **FACILITY INFORMATION**

### ***Description***

The Interstate Group facility in Nampa 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 prepared for paint and wired for lighting. After painting, the wiring is completed. Plywood is then installed for interior and floor surfaces and then the frame is undercoated. The outside 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.

### ***Permitting History***

September 26, 2016 P-2016.0032, Initial PTC for an existing facility at a new location, Permit status (A, but will become S upon issuance of this permit)

### ***Application Scope***

This PTC is for a minor modification at an existing minor facility.

The applicant has proposed to:

- Increase the use of an already permitted topcoat, Sherwin Williams Kem 400 Enamel Gloss Black (Kem 400), from 250 gallons per month to 500 gallons per month.
- Limit the use of a new primer, Sherwin Williams Kem Flash 500 Light Gray (Kem 500), to 100 gallons per month.
- Reduce the monthly use limits of two already permitted coatings, Sherwin Williams Touch-up Paint and Sherwin Williams Xylene Solvent to 3 gallons and 10 gallons, respectively.

### ***Application Chronology***

April 6, 2020	DEQ received an application.
April 10, 2020	DEQ received an application fee.
April 14, 2020 – April 29, 2020	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
May 11, 2020	DEQ determined that the application was complete.
June 19, 2020	DEQ made available the draft permit and statement of basis for peer and regional office review.
June 29, 2020	DEQ made available the draft permit and statement of basis for applicant review.
July 9, 2020	DEQ received the permit processing fee.
July 15, 2020	DEQ issued the final permit and statement of basis.

## TECHNICAL ANALYSIS

### *Emissions Units and Control Equipment*

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Sources	Control Equipment
<u>Makeup Air Unit</u> Manufacturer: Titan Model: TA-122 NG VRH Max. Capacity: 1.925 MMBth/hr Fuel: Natural Gas	None
<u>Unit Heaters 1-10</u> Manufacturer: SunStar Heating Products Model: SIR-35 Max. Capacity: 0.035 MMBtu/hr each Fuel: Natural Gas	None
<u>Wood Cutting</u> Max Production Rate: 60,000 ft/mth	<u>Two Dust Canisters</u> Manufacturer: Jet PM <sub>10</sub> control efficiency: 86%
<u>Welding</u>	None
<u>Painting Operations Paint Booth</u> Manufacturer: GFS Model: CDG, 1412NDT-50-SS-S HVLP Spray Gun Transfer Efficiency: 65% Rated Capacity: 4.7 gal/hr	<u>Fiberglass Exhaust Filters</u> Manufacturer: Chemco PM <sub>10</sub> control efficiency: 98.65%
<u>Undercoating Booth</u> Manufacturer: Custom – Partial Enclosure Airless Spray Gun Transfer Efficiency: 40%	<u>Fiberglass Exhaust Filters</u> Manufacturer: Chemco PM <sub>10</sub> control efficiency: 96%

### *Emissions Inventories*

#### **Potential to Emit**

IDAPA 58.01.01 defines Potential to Emit 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 potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the makeup air unit, ten unit heaters, wood cutting, welding, and painting and undercoating operations at the facility (see Appendix A) associated with this proposed project. Emissions estimates of criteria pollutant, HAP, and TAP were based on emission factors from AP-42, San Diego Welding Operations Guidance, operation of 8,760 hours per year, and process information specific to the facility for this proposed project.

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

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

The following table presents the pre-project potential to emit for all criteria pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

**Table 2 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>
Makeup Air Unit	0.014	0.06	0.001	0.005	0.19	0.83	0.16	0.69	0.01	0.05
Unit Heaters 1-10	0.003	0.01	0.0002	0.0009	0.03	0.14	0.01	0.06	0.002	0.008
Wood Cutting	0.08	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding	0.03	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paint Booth	0.08	0.18	0.00	0.00	0.00	0.00	0.00	0.00	9.89	22.78
Undercoating Booth	0.15	0.33	0.00	0.00	0.00	0.00	0.00	0.00	2.30	5.29
<b>Pre-Project Totals</b>	<b>0.36</b>	<b>0.85</b>	<b>0.001</b>	<b>0.006</b>	<b>0.22</b>	<b>0.97</b>	<b>0.17</b>	<b>0.75</b>	<b>12.20</b>	<b>28.13</b>

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.  
 b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

**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.

The following table presents the post project Potential to Emit for criteria pollutants from all emissions units at the facility as determined by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

**Table 3 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>
Makeup Air Unit	0.014	0.06	0.001	0.005	0.19	0.83	0.16	0.69	0.01	0.05
Unit Heaters 1-10	0.003	0.01	0.0002	0.0009	0.03	0.14	0.01	0.06	0.002	0.008
Wood Cutting	0.08	0.19	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Welding	0.03	0.08	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Paint Booth	0.08	0.18	0.00	0.00	0.00	0.00	0.00	0.00	10.69	24.63
Undercoating Booth	0.15	0.33	0.00	0.00	0.00	0.00	0.00	0.00	2.30	5.29
<b>Post Project Totals</b>	<b>0.36</b>	<b>0.85</b>	<b>0.001</b>	<b>0.006</b>	<b>0.22</b>	<b>0.97</b>	<b>0.17</b>	<b>0.75</b>	<b>13.00</b>	<b>29.95</b>

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.  
 b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

**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. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

**Table 4 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	0.36	0.85	0.001	0.006	0.22	0.97	0.17	0.75	12.20	28.13
Post Project Potential to Emit	0.36	0.85	0.001	0.006	0.22	0.97	0.17	0.75	13.00	29.95
<b>Changes in Potential to Emit</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.80</b>	<b>1.82</b>

**Non-Carcinogenic TAP Emissions**

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 5 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)
Barium	9.81E-06	9.81E-06	0.00	3.32E-02	No
Calcium Carbonate	2.07E-02	2.52E-02	6.7E-01	6.7E-01	No
Carbon Black	7.38E-04	1.55E-03	8.09E-04	2.3E-01	No
Chromium	3.12E-06	3.12E-06	0.00	3.3E-02	No
Copper	3.21E-06	3.21E-06	0.00	1.3E-02	No
Cumene	1.52E-02	3.49E-02	1.98E-02	16	No
Ethylbenzene	6.37E-01	1.15	2.9	29	No
Manganese	8.48E-07	8.48E-07	0.00	3.3E-03	No
Methyl Isobutyl Ketone	4.10E-02	5.77E-01	5.36E-01	14	No
Molybdenum	2.45E-06	2.45E-06	0.00	6.7E-01	No
Naphthalene	1.01E-02	3.43E-02	2.43E-02	3.3	No
Selenium	2.49E-04	2.49E-04	0.00	1.3E-02	No
Toluene	7.58E-06	7.58E-06	0.00	25	No
Trimethyl Benzene	2.33E-01	2.57E-01	2.43E-02	8.2	No
Vanadium	5.13E-06	5.13E-06	0.00	3.0E-03	No
VM&P Naphtha	2.28	3.72	1.44	91	No
Xylene	2.43	4.27	1.84	29	No
Zinc	6.47E-05	6.47E-05	0.00	6.7E-01	No
Zirconium compounds	1.41E-05	2.81E-05	1.41E-05	3.3E-01	No

All changes in emissions rates for non-carcinogenic TAP were below EL (screening emissions level) as a result of this project. Therefore, modeling is not required for any non-carcinogenic TAP because none of the 24-hour average non-carcinogenic screening ELs identified in IDAPA 58.01.01.585 were exceeded.

**Carcinogenic TAP Emissions**

A summary of the estimated PTE for emissions increase of carcinogenic toxic air pollutants (TAP) is provided in the following table.

**Table 6 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR CARCINOGENIC TOXIC AIR POLLUTANTS**

Carcinogenic Toxic Air Pollutants	Pre-Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Post Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Change in Annual Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Arsenic	4.5E-07	4.5E-07	0.00	1.5E-06	No
Benzene	4.7E-06	4.7E-06	0.00	8.0E-04	No
Benzo(a)pyrene	2.7E-09	2.7E-09	0.00	2.0E-06	No
Beryllium	2.7E-08	2.7E-08	0.00	2.8E-05	No
Cadmium	2.5E-06	2.5E-06	0.00	3.7E-06	No
Formaldehyde	1.7E-04	1.7E-04	0.00	5.1E-04	No
3-Methylchloranthene	4.0E-09	4.0E-09	0.00	2.5E-06	No
Nickel	4.7E-06	4.7E-06	0.00	2.7E-05	No
Polyaromatic Hydrocarbons	1.4E-07	1.4E-07	0.00	9.1E-05	No
POM <sup>(a)</sup>	2.5E-08	2.5E-08	0.00	2.0E-06	No

- a) Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. The total is compared to benzo(a)pyrene.

All changes in emissions rates for carcinogenic TAP were below EL (screening emissions level) as a result of this project. Therefore, modeling is not required for any carcinogenic TAP because none of the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

### **Post Project HAP Emissions**

The following table presents the post project potential to emit for HAP pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

**Table 7 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY**

<b>Hazardous Air Pollutants</b>	<b>PTE (T/yr)</b>
2-Methylnaphthalene	2.7E-07
3-Methylchloranthrene	2.0E-08
Acenaphthene	2.0E-08
Acenaphthylene	2.0E-08
Anthracene	2.7E-08
Arsenic	2.0E-06
Barium	5.0E-05
Benzene	1.2E-05
Benzo(a)anthracene	1.4E-08
Benzo(a)pyrene	2.0E-08
Benzo(b)fluoranthene	1.4E-08
Benzo(g,h,i)perylene	2.0E-08
Benzo(k)fluoranthene	2.0E-08
Beryllium	1.2E-07
Cadmium	1.1E-05
Chromium	2.3E-05
Chrysene	2.0E-08
Cobalt	3.5E-02
Cumene	4.6E-02
Dibenzo(a,h)anthracene	1.4E-08
Dichlorobenzene	1.2E-05
Ethylbenzene	3.0E+00
Fluoranthene	3.4E-08
Fluorene	3.2E-08
Formaldehyde	7.3E-04
Hexane	1.8E-02
Indeno(1,2,3-cd)pyrene	2.0E-08
Lead Compounds	4.9E-06
Manganese	5.2E-04
Mercury Compounds	2.5E-06
Methyl Isobutyl Ketone	1.5E+00
Naphthalene	5.6E-02
Nickel	2.2E-05
Phenanthrene	1.9E-07
Pyrene	5.6E-08
Polycyclic Organic Matter	1.1E-07
Selenium	2.3E-07
Toluene	1.4E+00
Xylene	9.8E+00
<b>Totals</b>	<b>15.9</b>

## **Ambient Air Quality Impact Analyses**

An ambient air quality impact analysis is not required for this project because based on the emission inventory for this facility, emissions of criteria pollutants are below regulatory concern. In addition, the emissions increase of all TAPs are below screening emission levels in Idaho Rules 585 and 586. Therefore, modeling of criteria pollutants and TAPS are not required for this project.

## **REGULATORY ANALYSIS**

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

The facility is located in Canyon 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 HAPs (Hazardous Air Pollutants) Only:

- A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.
- SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.
- SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.
- B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.
- UNK = Class is unknown.

For All Other Pollutants:

- A = Use when permitted emissions of a pollutant are > 100 T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.
- B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 100 T/yr major source threshold.
- UNK = Class is unknown.

**Table 8 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION**

<b>Pollutant</b>	<b>Uncontrolled PTE (T/yr)</b>	<b>Permitted PTE (T/yr)</b>	<b>Major Source Thresholds (T/yr)</b>	<b>AIRS/AFS Classification</b>
PM	97.07	0.85	<b>100</b>	B
PM <sub>10</sub>	97.07	0.85	<b>100</b>	B
PM <sub>2.5</sub>	97.07	0.85	<b>100</b>	B
SO <sub>2</sub>	0.006	0.006	<b>100</b>	B
NO <sub>x</sub>	0.97	0.97	<b>100</b>	B
CO	0.75	0.75	<b>100</b>	B
VOC	116.99	29.95	<b>100</b>	SM
HAP (single)	> 10	9.8	<b>10</b>	SM-80
Total HAPs	> 25	15.9	<b>25</b>	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 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 emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 2.5.

**Standards for New Sources (IDAPA 58.01.01.676)**

IDAPA 58.01.01.676 ..... Standards for New Sources

The fuel burning equipment located at this facility, with a maximum rated input of ten (10) million BTU per hour or more, are subject to a particulate matter limitation of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting gaseous fuels. Fuel-Burning Equipment is defined as any furnace, boiler, apparatus, stack and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer. This requirement is assured by Permit Condition 2.7.

**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 PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC 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. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility 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 40 CFR Part 60.

**NESHAP Applicability (40 CFR 61)**

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

**MACT/GACT Applicability (40 CFR 63)**

The facility has proposed to operate as a minor source of hazardous air pollutant (HAP) emissions, and has received a letter from DEQ on February 10, 2020 that the facility is exempt from the requirements of 40 CFR 63, Subpart HHHHHH–National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

**Permit Conditions Review**

This section describes only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Deleted Permit Condition 2.11

This permit condition has been removed because the facility is now exempt from 40 CFR 63, Subpart HHHHHH and is not subject to any other NSPS or NESHAP requirements.

Revised Table 3.2

This table was revised to include new VOC limits and HAP limits. The facility has decided to retain their monthly limits for PM<sub>10</sub> and VOC and monthly monitoring and recordkeeping.

Permit Condition 3.6 was revised to include Sherwin Williams Kem Flash 500 Light Gray (Kem 500) as a new coating and to reduce the monthly usage limits for both Sherwin Williams Xylene Solvent and Sherwin Williams Touch-Up Paint. The monthly limit of Sherwin Williams Black Paint (Kem 400) or Asphalt Co. 9900 Paint was also increased from 250 gallons to 500 gallons.

Permit Conditions 3.8 – 3.13 and 3.15

These permit conditions were added as alternate daily coating usage scenarios to provide the facility more flexibility when using a coating not listed in the approved coatings (Table 3.3). These permit conditions require daily coating usage scenarios, estimating emissions including TAPs, and modeling to demonstrate compliance, along with monitoring and recordkeeping. Any alternate coating usage shall be reported annually to DEQ.

Deleted Old Permit Conditions 3.11 – 3.14

Because the facility is now exempt from 40 CFR 63, Subpart HHHHHH, old permit conditions 3.11 through 3.14 have been removed from the permit.

## **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 or IDAPA 58.01.01.404.01.c. During this time, there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

## APPENDIX A – EMISSIONS INVENTORIES



Table 3-1: Paint Analysis

Revised Pre-Project Monthly Limits (gal)	Increased Proposed in Permit Modification (gal)	Proposed Post-Project Monthly Limits (gal)	Manufacturer	Coating Material	Quartz	Cristobalite	hydrotrated middle petroleum distillates	Naphtha hydrotrated light	
					14808-60-7	14454-46-1	64742-46-7	64742-49-0	
65	0	65	Henkel	Quad Sealant Advanced Grey/Black	1.0%				
50	0	50	Henkel	Quad Sealant Clear					
50	0	50	Henkel	Quad Sealant White					
50	0	50	Walmart	Black Spray					
50	0	50	Rust-Oleum	Silver Spray					
3	0	3	Sherwin Williams	Touch-Up Paint					
40	0	40	Columba	Interior Wall Paint/Floor Paint		0.8%			
100	0	100	LaVanture Products	Adhesive White/Black					
50	0	50	Henkel	Almond - LOS PSS 10.00Z ACWS ALM 12CC	1.0%				
50	0	50	H. Tech Industries	Silicone (Project 1)			26.0%		
10	0	10	Sherwin Williams	Xylene					
50	0	50	Sherwin Williams	Mineral Spirits					
220.1	220.1	400.1	Asphalt Co.	9900 Paint				20.0%	
50	0	50	Asphalt Co.	9970 Primer				20.0%	
50	0	50	H-Life Solutions	AeroGreen Paint Prep					
10	0	10	Sherwin Williams	Acetone					
200	200	500	Sherwin Williams	Black Paint (Kem 400) 1"					
10	0	10	Columba	Gray Primer	0.1%				
0	100	100	Sherwin Williams	Kem Flash 500 Primer Black 1"					
					If volatile, enter "1" =>				
					TAP	Y	Y	Y	Y
					HAP	N	N	N	N
		Manufacturer		Coating Material	Quartz	Cristobalite	hydrotrated middle petroleum distillates	Naphtha hydrotrated light	
					lbs./hr.	lbs./hr.	lbs./hr.	lbs./hr.	
		Henkel		Quad Sealant Advanced Grey/Black	0.018				
		Henkel		Quad Sealant Clear					
		Henkel		Quad Sealant White					
		Walmart		Black Spray					
		Rust-Oleum		Silver Spray					
		Sherwin Williams		Touch-Up Paint					
		Columba		Interior Wall Paint/Floor Paint		0.008			
		LaVanture Products		Adhesive White/Black					
		Henkel		Almond - LOS PSS 10.00Z ACWS ALM 12CC	0.018				
		H. Tech Industries		Silicone (Project 1)			0.271		
		Sherwin Williams		Xylene					
		Sherwin Williams		Mineral Spirits					
		Asphalt Co.		9900 Paint				0.000	
		Asphalt Co.		9970 Primer				0.223	
		H-Life Solutions		AeroGreen Paint Prep					
		Sherwin Williams		Acetone					
		Sherwin Williams		Black Paint (Kem 400)					
		Columba		Gray Primer	0.000				
		Sherwin Williams		Kem Flash 500 Primer Black 3					
				Spray Total - Pre Project (lb/hr)	0.037	0.008	0.271	0.223	
				Spray Total - Increase (lb/hr)	0.000	0.000	0.000	0.000	
				Spray Total - Post Project (lb/hr)	0.037	0.008	0.271	0.223	
		Manufacturer		Coating Material	Quartz	Cristobalite	hydrotrated middle petroleum distillates	Naphtha hydrotrated light	
					tons/yr	tons/yr	tons/yr	tons/yr	
		Henkel		Quad Sealant Advanced Grey/Black	0.04				
		Henkel		Quad Sealant Clear					
		Henkel		Quad Sealant White					
		Walmart		Black Spray					
		Rust-Oleum		Silver Spray					
		Sherwin Williams		Touch-Up Paint					
		Columba		Interior Wall Paint/Floor Paint		0.02			
		LaVanture Products		Adhesive White/Black					
		Henkel		Almond - LOS PSS 10.00Z ACWS ALM 12CC	0.04				
		H. Tech Industries		Silicone (Project 1)			0.62		
		Sherwin Williams		Xylene					
		Sherwin Williams		Mineral Spirits					
		Asphalt Co.		9900 Paint				0.00	
		Asphalt Co.		9970 Primer				0.51	
		H-Life Solutions		AeroGreen Paint Prep					
		Sherwin Williams		Acetone					
		Sherwin Williams		Black Paint (Kem 400)					
		Columba		Gray Primer	0.00				
		Sherwin Williams		Kem Flash 500 Primer Black 3					
				Spray Total - Pre Project (tons/yr)	0.09	0.02	0.62	0.51	
				Spray Total - Increase (tons/yr)	0.000	0.000	0.000	0.000	
				Spray Total - Post Project (tons/yr)	0.09	0.02	0.62	0.51	

Example Calculations  
 Max Hourly Ethylbenzene in Sherwin Williams KEM Flash 500 Primer  
 (24-hr. average)  
 Max 12-month Ethylbenzene in Sherwin Williams KEM Flash 500 Primer

- Notes:  
 1 Sherwin Williams KEM 400 and Asphalt Co 9900 paint can be used interchange  
 2 Increase current limit Sherwin Williams Black KEM 400 (or sphalt Co. 9900) 2!  
 3 Add limit Sherwin Williams KEM Flash 500 Primer 100 gals./mo.

**Table 3-2: Paint Booth Criteria Pollutant Emissions Summary**

Toxic Air Pollutants	Increased Restricted Maximum Spray Rate <sup>1</sup> (lb/hr)	Spray Retention Rate <sup>2</sup>	Increased Restricted Potential to Emit (lb/hr)	Paint Filter Efficiency <sup>4</sup>	Increased Controlled Emission Rate (lb/hr)	TAP EL	Increased Emission as of % TAP EI
		(%)		(%)			
naphthalene 91-20-3	0.024	0%	0.02	0%	0.02	3.33	1%
cumene 98-82-8	0.020	0%	0.02	0%	0.02	16.3	0%
ethylbenzene 100-41-4	0.508	0%	0.51	0%	0.51	29	2%
Methyl Isobutyl Ketone 108-10-1	0.536	0%	0.54	0%	0.54	13.7	4%
trimethyl benzene mixed and individual isomers 25551-13-7 (1,2,4-trimethylbenzene 95-63-6) (1,3,5-trimethylbenzene 108-67-8)	0.253	0%	0.02	0%	0.02	8.200	0%
calcium carbonate 1317-65-3	0.952	65% Primer	0.33	98.65%	0.00	0.667	1%
xylene (o-, m-, p-isomers) 1330-20-7	1.840	0%	1.84	0%	1.84	29	6%
Carbon Black 1333-86-4	0.191	65% Primer 85% Topcoat	0.06	98.65%	0.0008	0.230	0%
Zirconium compounds as Zr	0.007	85%	0.00	98.65%	0.0000	0.333	0%
VM & P Naphtha 8032-32-4 (naphtha, light aromatic 64742-95-6) (Hydrotreated Light Distillate 64742-47-8) (mineral spirits 64742-88-7)	1.438	0%	1.44	0%	1.44	91.3	2%

Increased PM Emissions

Criteria Air Pollutants	Maximum Spray Rate <sup>1</sup>		Spray Retention Rate <sup>2</sup>	Potential to Emit		Paint Filter Efficiency <sup>2</sup>	Controlled Emissions	
	lb/hr	ton/yr		lb/hr	ton/yr		lb/hr	ton/yr
PM <sub>10</sub>	4.24	9.78	65% Primer 85% Topcoat	1.12	2.59	98.65%	0.015	0.035
PM <sub>2.5</sub>	4.24	9.78	65% Primer 85% Topcoat	1.12	2.59	98.65%	0.015	0.035
VOC	4.09	9.42	0%	4.09	9.42	0%	4.09	9.42

Hazardous Air Pollutants (HAP)	Maximum Spray Rate <sup>1</sup> (ton/yr)	Spray Retention Rate (%)	Paint Filter Efficiency <sup>4</sup> (%)	Potential to Emit (ton/yr)
cumene 98-82-8	0.05	0%	0%	0.05
Cobalt 2-Ethyl-hexanoate 136-52-7	0.03	65%	99%	0.00
ethylbenzene 100-41-4	1.17	0%	0%	1.17
methyl isobutyl ketone 108-10-1	1.24	0%	0%	1.24
naphthalene 91-20-3	0.06	0%	0%	0.06
m-Xylenes 1330-20-7	4.24	0%	0%	4.24

Notes:

- The maximum hourly or annual Spray Total of the coatings.
- Non-volatile emissions for primer using permitted LPH-200 HVLP spray gun calculated at 65% Retention Rate.  
Non-volatile emission for top coat paint using proposed electrostatic spray gun are calculated using a coating retention rate of 85%.  
a) Department of Environmental Protection, Office of Pollution Prevention and Compliance Assistance, Harrisburg, PA, 7000-FS-DEP2113 May 1997; Transfer Efficiency 85% electrostatic spray.  
b) USEPA, AP-42, Chapter 4.2.2.8 Automobile And Light Duty Truck Surface Coating Operations, August 1982; Transfer Efficiency 60-90% electrostatic spray.  
c) USEPA, AP-42, Chapter 4.2.2.1 General Industrial Surface Coating, April 1981, Transfer Efficiency 90-95% electrostatic spray.
- Chemco fiberglass exhaust filters (36), 20 inches by 20 inches, 2 inches thick are mounted on the side-wall.  
According to test data, the filter media have an average removal efficiency of 98.95%. For the purposes of estimating emissions, 98.65% control efficiency is used

Example Calculations

Maximum hourly or yearly spray rate lbs./hr. \* (100%-spray retention rate %) \* (100%-filter efficiency%) = controlled lbs per hr. or tons/year  
 Example PM10 lbs./hr. calculation: maximum total paint solids 18.6 lbs./hr. \* (100%-65%) \* (100%-98.65%) = 0.088 lbs. PM10/hr.  
 Example PM10 ton/year calculation: maximum total paint solids 42.87 tons/yr. \* (100%-65%) \* (100%-98.65%) = 0.203 tons PM10/yr.

**Table 4-1  
Paint Coating Uncontrolled Toxic Air Pollutant Emissions**

**Table 4-1 Pre-Project Unrestricted Uncontrolled Potential to Emit**

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead	CO <sub>2e</sub>
	tons/yr							
MAU1	0.26	0.26	0.00	0.83	0.69	0.05	0.00	986.50
UH	0.05	0.05	0.00	0.14	0.06	0.01	0.00	179.37
Wood Cutting	0.78	0.78	0.00	0.00	0.00	0.00	0.00	0.00
Welding	0.34	0.34	0.00	0.00	0.00	0.00	0.00	0.00
Paint Booth	46.16	46.16	0.00	0.00	0.00	15.21	0.00	0.00
Undercoating Booth	1.40	1.40	0.00	0.00	0.00	5.29	0.00	0.00
<b>Total =</b>	<b>48.99</b>	<b>48.99</b>	<b>0.01</b>	<b>0.97</b>	<b>0.75</b>	<b>20.56</b>	<b>0.00</b>	<b>1165.87</b>

**Table 4-1 b: Post-Project Unrestricted Uncontrolled Potential to Emit**

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead	CO <sub>2e</sub>
	tons/yr							
MAU1	0.26	0.26	0.00	0.83	0.69	0.05	0	986.5
UH	0.05	0.05	0.00	0.14	0.06	0.01	0	179.4
Wood Cutting	0.78	0.78	0.00	0.00	0.00	0.00	0	0.0
Welding	0.34	0.34	0.00	0.00	0.00	0.00	0	0.0
Paint Booth	57.03	57.03	0.00	0.00	0.00	54.76	0	0.0
Undercoating Booth	1.40	1.40	0.00	0.00	0.00	5.29	0	0.0
<b>Total =</b>	<b>59.86</b>	<b>59.86</b>	<b>0.01</b>	<b>0.97</b>	<b>0.75</b>	<b>60.1</b>	<b>0</b>	<b>1165.9</b>

**Table 4-1c: Changes in Unrestricted Uncontrolled Potential to Emit**

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead	CO <sub>2e</sub>
	tons/yr							
MAU1	0.00	0.00	0.0	0.0	0.0	0.0	0	0
UH	0.00	0.00	0.0	0.0	0.0	0.0	0	0
Wood Cutting	0.00	0.00	0.0	0.0	0.0	0.0	0	0
Welding	0.00	0.00	0.0	0.0	0.0	0.0	0	0
Paint Booth	10.87	10.87	0.0	0.0	0.0	39.5	0	0
Undercoating Booth	0.00	0.00	0.0	0.0	0.0	0.0	0	0
<b>Total =</b>	<b>10.87</b>	<b>10.87</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>39.5</b>	<b>0</b>	<b>0</b>

Example Painting Unrestricted Uncontrolled PTE Calculations

Restricted painting based on 10 hrs./day, 4 days/week, prorated to 24 hrs./day, 7 days/week.  
 Total Restricted Paint PM lbs./mo. = [(paint1 gal/mo. \* paint1 density \* paint1 solids%) + ...+ (paint18 gal/mo. \* paint18 density \* paint18 solids%)] = 6,356 lbs paint solids/mo.  
 Total Unrestricted Paint PM lbs./mo. = Unrestricted paint solids lbs./mo. \* (672 unrestricted hrs./mo.) / (160 restricted hrs./mo.)  
 = (Restricted 6,356 paint solids lbs./mo.) \* 672 / 160 = 26,695 Unrestricted paint solids lbs/mo.  
 total unrestricted lbs. PM emitted/mo. = Unrestricted paint solids lbs/mo. \* (100%-retention%)  
 = 26,695 lbs/mo. \* 35% = 9,343 lbs unstricted PM emitted/mo.  
 Max. estimated unrestricted PM emissions tons/yr. = unrestricted PM emissions lbs/mo \* (12 mos./yr) / (2000 lbs/ton)  
 = 9,343 lbs PM/mo. \* 12 / 2000 = 56 tons PM/yr  
 Total Restricted Paint VOC lbs./mo. = [(paint1 gal/mo. \* paint1 density \* paint1 VOC%) + ...+ (paint18 gal/mo. \* paint18 density \* paint18 VOC%)] = 3,758 lbs paint VOC/mo.  
 Total Unrestricted Paint VOC lbs./mo. = Unrestricted paint VOCs lbs./mo. \* (672 unrestricted hrs./mo.) / (160 restricted hrs./mo.) = 3,758 total unrestricted lbs. VOC sprayed/mo.  
 = (Restricted 3,758 paint VOC lbs./mo.) \* 672 / 160 = 15,783 Unrestricted paint VOC lbs/mo.  
 total unrestricted VOC lbs. emitted/mo. = Unrestricted paint VOC lbs/mo.  
 = 15,783 VOC emitted lbs./mo. = 15,783 lbs unstricted VOC/mo.  
 Max. estimated unrestricted emissions tons/yr. = lbs/mo \* (12 mos./yr) / (2000 lbs/ton)  
 = 15,753 lbs PM/mo. \* 12 / 2000 = 95 tons PM/yr

**Tables 4-2  
Facility-Wide NSR Regulated Pollutant Emissions**

**Table 4-2 Pre-Project Potential to Emit** (based on SOB<sup>1</sup>)

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead	CO <sub>2e</sub>
	tons/yr							
MAU1	0.06	0.06	5.0E-03	0.8	0.7	0.05	4.1E-06	986.5
UH	0.01	0.01	0.001	0.1	0.06	0.01	7.5E-07	179.4
Wood Cutting	0.2	0.2	0	0	0	0	0	0.0
Welding	0.08	0.08	0	0	0	0	0	0.0
Paint Booth	0.15	0.15	0	0	0	15.21	0	0.0
Undercoating Booth	0.33	0.33	0	0	0	5.29	0	0.0
<b>Total =</b>	<b>0.82</b>	<b>0.82</b>	<b>0.006</b>	<b>0.97</b>	<b>0.75</b>	<b>20.6</b>	<b>4.9E-06</b>	<b>1165.9</b>

**Table 4-2b: Post-Project Potential to Emit** (based on requested permit conditions)

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead	CO <sub>2e</sub>
	tons/yr							
MAU1	0.06	0.06	0.00	0.83	0.69	0.05	0	986.5
UH	0.011	0.01	0.00	0.14	0	0	0	179.4
Wood Cutting	0.19	0.19	0	0	0	0	0	0
Welding	0.08	0.08	0	0	0	0	0	0
Paint Booth	0.18	0.18	0	0	0	24.6	0	0
Undercoating Booth	0.33	0.33	0	0	0	5.3	0	0
<b>Total =</b>	<b>0.86</b>	<b>0.86</b>	<b>0.01</b>	<b>0.97</b>	<b>0.75</b>	<b>30.0</b>	<b>0</b>	<b>1165.9</b>

**Table 4-21c: Changes in Potential to Emit**

Emissions Unit	PM <sub>2.5</sub>	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>2</sub>	CO	VOC	Lead	CO <sub>2e</sub>
	tons/yr							
MAU1	0	0	0	0	0	0	0	0
UH	0	0	0	0	0	0	0	0
Wood Cutting	0	0	0	0	0	0	0	0
Welding	0	0	0	0	0	0	0	0
Paint Booth	0.03	0.03	0	0	0	9.4	0	0
Undercoating Booth	0	0	0	0	0	0	0	0
<b>Total =</b>	<b>0.03</b>	<b>0.03</b>	<b>0</b>	<b>0.00</b>	<b>0.00</b>	<b>9.4</b>	<b>0</b>	<b>0</b>

1 Idaho Department of Environmental Quality, Statement of Basis, Permit to Construct No. P-2016.0032, Project ID 61730, Interstate Group, LLC, Facility ID 027-00153, September 26, 2016

**Table 4-3  
Facility-Wide Regulated Criteria Pollutant Emissions Increase**

Criteria Air Pollutants	PTE Emissions	
	lb/hr	T/yr
NO <sub>2</sub>		
CO		
PM <sub>10</sub> <sup>1</sup>	0.015	0.03
PM <sub>2.5</sub> <sup>1</sup>	0.015	0.03
SO <sub>2</sub>		
VOC		
Lead		
<b>Total Criteria Emissions (ton/yr) =</b>		<b>0.03</b>

Significance Threshold	
T/yr	Exceed?
40	No
100	No
15	No
10	No
40	No
40	No
0.6	No

Below Regulatory Concern	
T/yr	Exceed?
4	No
10	No
1.5	No
1	No
4	No
4	No
0.06	No

**Table 4-4**  
**Facility Wide Controlled TAP Pollutant Emissions Increase**  
**Interstate Trailer, Nampa, Idaho**

Non-Carcinogenic Toxic Air Pollutants	CAS	Pre-Project (lb/hr)	Post Project (lb/hr)	Controlled Emission Change (lb/hr)	Screening Emission Level (lb/hr)	Controlled Emission Change Exceeds TAP EL?
Barium		9.81E-06	9.81E-06	0.00E+00	3.3E-02	NA
4-methylpentan-2-one (Methyl isobutyl ketone)	108-10-1	4.10E-02	5.77E-01	5.36E-01	1.4E+01	No
Carbon Black	1333-86-4	7.38E-04	1.55E-03	8.09E-04	2.3E-01	No
Chromium	7440-47-3	3.12E-06	3.12E-06	0.00E+00	3.3E-02	NA
Copper	7440-50-8	3.21E-06	3.21E-06	0.00E+00	1.3E-02	NA
Cumene	98-82-8	1.52E-02	3.49E-02	1.98E-02	1.6E+01	No
Ethylbenzene	100-41-4	6.37E-01	1.15E+00	5.08E-01	2.9E+01	No
Calcium Carbonate (limestone 1317-65-3)	471-34-1	2.07E-02	2.52E-02	4.50E-03	6.7E-01	No
Manganese	7439-96-5	8.48E-07	8.48E-07	0.00E+00	3.3E-03	NA
Molybdenum, compounds as Mo	7439-98-7	2.45E-06	2.45E-06	0.00E+00	6.7E-01	NA
Naphthalene	91-20-3	1.01E-02	3.43E-02	2.43E-02	3.3E+00	No
Selenium	7782-49-2	2.49E-04	2.49E-04	0.00E+00	1.3E-02	NA
Toluene	108-88-3	7.58E-06	7.58E-06	0.00E+00	2.5E+01	NA
Trimethyl Benzene (mixed and individual isomers) (1,2,4-Trimethylbenzene (95-63-6) (1,3,5-Trimethylbenzene 108-67-8) (1,2,3-Trimethylbenzene 536-73-8)	25551-13-7	2.33E-01	2.57E-01	2.43E-02	8.2E+00	No
Vanadium, as V2O5	1314-62-1	5.13E-06	5.13E-06	0.00E+00	3.0E-03	NA
VM & P Naphtha (Naphtha, light aromatic 64742-95-6) (Hydrotreated Light Distillate 64742-47-8) (Mineral Spirits 64742-88-7)	8032-32-4	2.28E+00	3.72E+00	1.44E+00	9.1E+01	No
Xylene	1330-20-7	2.43E+00	4.27E+00	1.84E+00	2.9E+01	No
Zinc	1314-13-2	6.47E-05	6.47E-05	0.00E+00	6.7E-01	NA
Zirconium compounds as Zr		1.41E-05	2.81E-05	1.41E-05	3.3E-01	No

Carcinogenic Toxic Air Pollutants	CAS	Pre-Project (lb/hr)	Post Project (lb/hr)	Controlled Emission Change (lb/hr)	Screening Emission Level (lb/hr)	Controlled Emission Change Exceeds TAP EL?
Arsenic		4.5E-07	4.5E-07	0.00	1.5E-06	NA
Benzene	108-10-1	4.7E-06	4.7E-06	0.00	8.0E-04	NA
Benzo(a)pyrene		2.7E-09	2.7E-09	0.00	2.0E-06	NA
Beryllium		2.7E-08	2.7E-08	0.00	2.8E-05	NA
Cadmium		2.5E-06	2.5E-06	0.00	3.7E-06	NA
Formaldehyde		1.7E-04	1.7E-04	0.00	5.1E-04	NA
3-Methylchloranthene		4.0E-09	4.0E-09	0.00	2.5E-06	NA
Nickel		4.7E-06	4.7E-06	0.00	2.7E-05	NA
Polyaromatic Hydrocarbons (PAH)		1.4E-07	1.4E-07	0.00	9.1E-05	NA
Polycyclic Organic Matter (POM)		2.5E-08	2.5E-08	0.00	2.0E-06	NA

**Table 4 5**  
**Facility-Wide Hazardous Air Pollutant Emission Summary**

Hazardous Air Pollutants (HAP)	CAS	Pre Project (tons/yr)	Post Project (tons/yr)	Emission Change (tons/yr)
2-Methylnaphthalene	91-57-6	2.7E-07	2.7E-07	0.0E+00
3-Methylchloranthrene	56-49-5	2.0E-08	2.0E-08	0.0E+00
Acenaphthene	83-32-9	2.0E-08	2.0E-08	0.0E+00
Acenaphthylene	208-96-8	2.0E-08	2.0E-08	0.0E+00
Anthracene	120-12-7	2.7E-08	2.7E-08	0.0E+00
Arsenic	7440-38-2	2.0E-06	2.0E-06	0.0E+00
Barium	7440-39-3	5.0E-05	5.0E-05	0.0E+00
Benzene	71-43-2	1.2E-05	1.2E-05	0.0E+00
Benzo(a)anthracene	56-55-3	1.4E-08	1.4E-08	0.0E+00
Benzo(a)pyrene	50-32-8	2.0E-08	2.0E-08	0.0E+00
Benzo(b)fluoranthene	205-99-2	1.4E-08	1.4E-08	0.0E+00
Benzo(g,h,i)perylene	191-24-2	2.0E-08	2.0E-08	0.0E+00
Benzo(k)fluoranthene	207-08-9	2.0E-08	2.0E-08	0.0E+00
Beryllium	7440-41-7	1.2E-07	1.2E-07	0.0E+00
Cadmium	7440-43-9	1.1E-05	1.1E-05	0.0E+00
Chromium	7440-47-3	2.3E-05	2.3E-05	0.0E+00
Chrysene	218-01-9	2.0E-08	2.0E-08	0.0E+00
Cobalt	7440-48-4	8.2E-07	3.5E-02	3.5E-02
Cumene	98-82-8	0.0E+00	4.6E-02	4.6E-02
Dibenzo(a,h)anthracene	53-73-3	1.4E-08	1.4E-08	0.0E+00
Dichlorobenzene	25321-22-6	1.2E-05	1.2E-05	0.0E+00
Ethylbenzene	100-41-4	1.8E+00	3.0E+00	1.2E+00
Fluoranthene	206-44-0	3.4E-08	3.4E-08	0.0E+00
Fluorene	86-73-7	3.2E-08	3.2E-08	0.0E+00
Formaldehyde	50-00-0	7.3E-04	7.3E-04	0.0E+00
Hexane	110-54-3	1.8E-02	1.8E-02	0.0E+00
Indeno(1,2,3-cd)pyrene	193-39-5	2.0E-08	2.0E-08	0.0E+00
Lead Compounds	7439-92-1	4.9E-06	4.9E-06	0.0E+00
Manganese	7439-96-5	5.2E-04	5.2E-04	0.0E+00
Mercury Compounds	7439-97-6	2.5E-06	2.5E-06	0.0E+00
Methyl Isobutyl Ketone	108-10-1	3.1E-01	1.5E+00	1.2E+00
Naphthalene	91-20-3	6.0E-06	5.6E-02	5.6E-02
Nickel	7440-02-0	2.2E-05	2.2E-05	0.0E+00
Phenanthrene	85-01-8	1.9E-07	1.9E-07	0.0E+00
Pyrene	1290-00-0	5.6E-08	5.6E-08	0.0E+00
Polycyclic Organic Matter	NA	1.1E-07	1.1E-07	0.0E+00
Selenium	7782-49-2	2.3E-07	2.3E-07	0.0E+00
Toluene	108-88-3	1.4E+00	1.4E+00	0.0E+00
Xylene	1330-20-7	5.6E+00	9.8E+00	4.2E+00
Total		9.2	15.9	6.7E+00

## **APPENDIX B – FACILITY DRAFT COMMENTS**

**The following comments were received from the facility on June 30, 2020:**

**Facility Comment:** Under Table 3.3 Monthly Coatings Usage Limits on page number 9, the Sherwin Williams Kem Flash 500 Black (Kem 500) should read, Sherwin Williams Kem Flash 500 Light Gray (Kem 500).

**DEQ Response:** The requested change has been made in both the permit and the statement of basis.

## **APPENDIX C – PROCESSING FEE**

## PTC Processing Fee Calculation Worksheet

**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:** Interstate Group LLC  
**Address:** 605 N. 39th St.  
**City:** Nampa  
**State:** ID  
**Zip Code:** 83687  
**Facility Contact:** Kevin Bennett  
**Title:** Operations Manager  
**AIRS No.:** 027-00153

- 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)

Emissions Inventory			
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	1.8	0	1.8
<b>Total:</b>	0.0	0	<b>1.8</b>
Fee Due	<b>\$ 2,500.00</b>		

Comments: