

**Statement of Basis
Automotive Coating Operations General Permit**

**Permit to Construct P-2017.0009
Project No. 61847**

**Dennis Dillon Automotive
Boise, Idaho**

Facility ID No. 001-00342

Final

**March 3, 2017
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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

AQCR	Air Quality Control Region
Btu	British thermal units
CAS No.	Chemical Abstracts Service registry number
CE	control efficiency
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
gal/day	gallons per calendar day
gal/hr	gallons per hour
gal/yr	gallons per consecutive 12 calendar month period
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HDI	hexamethylene diisocyanate
hr/yr	hours per year
HVLP	high volume, low pressure (applies to paint spray guns)
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/gal	pounds per gallon
lb/hr	pounds per hour
LPG	Liquefied Petroleum Gas
MDI	methylene diisocyanate
MMBtu	million British thermal units
MSDS	Material Safety Data Sheets
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
short-term	emission estimate or emission limit with an averaging period of 24 hours or less
SIC	Standard Industrial Classification
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per consecutive 12-calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TE	transfer efficiency
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

FACILITY INFORMATION

Description

Dennis Dillon Automotive is a facility with paint spray booth(s) which is equipped with a paint booth heater. The paint booth(s) is a side draft booth(s) with fiber filtration media for control of particulate emissions. The booth(s) is equipped with a natural gas-fired burner to heat the booth. The process includes application of coatings via a HVLP (or equivalent) paint gun. In this case “or equivalent” means a paint gun that has a minimum 65% transfer efficiency as documented by the spray gun manufacturer.

Dennis Dillon Automotive applied for a pickup bed lining operation. The general permit allows pickup bed and miscellaneous part coating as well as traditional automotive painting operations.

Permitting History

This is the initial PTC for a new facility thus there is no permitting history.

Application Scope

This is the initial PTC for a new facility.

Application Chronology

February 2, 2017	DEQ received an application and processing fee.
February 3, 2017	DEQ received an application fee and the processing fee.
February 13-28, 2017	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.

TECHNICAL ANALYSIS

The facility utilizes fiber filtration media for control of particulate matter emissions from the automotive coating operation. In addition, HVLP paint guns (or equivalent) are used to minimize PM₁₀ and VOC emissions from painting. The HVLP (or equivalent) spray equipment will control PM₁₀ and VOC emissions by having more paint transfer to the desired surfaces than traditional painting equipment.

Emissions Units and Control Devices

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source Descriptions	Control Equipment Descriptions
<p><u>Paint spray booth(s)</u> Manufacturer/model: custom <i>Note: the number of booths installed at the facility is not limited by this permit</i></p> <p><u>Paint spray booth heater(s)</u> Manufacturer/model: MODINE Heat input capacity: up to 10.0 MMBtu/hr Fuel: natural gas only <i>Note: the number of natural gas-fired heaters installed at the facility is not limited by this permit, but the total heat input capacity of all heaters combined shall be less than 10.0 MMBtu/hr</i></p>	<p><u>Paint spray booths and preparation station filter systems</u> Booth type: Side draft Manufacturer/model: custom Particulate filtration method: Dry filters or equivalent PM/PM₁₀ control efficiency: 98% or greater</p> <p><u>Coating spray guns</u> Type: HVLP or equivalent^a Transfer efficiency: 65% or greater</p>

a) or equivalent means guns with at least a 65% transfer efficiency as documented by the manufacturer

Emission Inventories

Potential to Emit

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

Using this definition of Potential to Emit an emission inventory was developed for the automotive coating operation associated with this proposed project (see Appendix A for detailed potential to emit calculations). Criteria pollutant and HAP PTE were based on the worst-case VOC, PM₁₀, and HAP content in coatings as taken from the DEQ Automotive Coating EI spreadsheet (see TRIM record #2017AAG267).

Uncontrolled Potential to Emit

Using the definition of 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 criteria pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for criteria pollutants as determined by DEQ staff. See TRIM record #2017AAG267 for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this automotive coating operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 2,080 hrs/yr (8 hrs/day x 260 days/yr) with all coating operations occurring during this time. Since there is prep time (the time spent preparing the automobile for the application of coating) and paint drying time (the time the automobile spends in the booth with the burner operating to facilitate hardening of the coating) associated with applying coatings, this was considered to be the worst-case maximum for which emissions would occur.

Table 2 UNCONTROLLED POTENTIAL TO EMIT CRITERIA POLLUTANTS

Emissions Unit	PM ₁₀	SO ₂	NO _x	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Paint spray booths and preparation stations	6.79	0.0	0.0	0.0	19.98
Paint spray booth heaters^a	0.02	0.03	0.978	0.416	0.057
Uncontrolled Totals	6.81	0.03	0.98	0.42	20.04

a) Estimates provided in this summary table are for heater(s) with heat input capacity of 10 MMBtu/hr (combined), while the proposed heater(s) may be of lesser capacity.

The following table presents the uncontrolled Potential to Emit for HAP pollutants as determined by DEQ staff. For this automotive coating operation uncontrolled HAP emissions were calculated by using the DEQ Automotive Coating EI spreadsheet (see TRIM record #2017AAG267) and setting paint use to 4.0 gallons per day (as limited by the permit). Then, the worst-case maximum HAP Potential to Emit was determined for all paints listed in the spreadsheet. As discussed previously, HAP emissions were assumed to occur when operating the facility 2,080 hr/yr.

Table 3 UNCONTROLLED POTENTIAL TO EMIT FOR HAP

HAP Pollutants	PTE (T/yr)
Ethyl benzene	0.61
Methyl Isobutyl Ketone (MIBK)	1.26
Methylene Diisocyanate	0.0124
Naphthalene	2.34
Toluene	1.92
Styrene	2.51
Xylene (o-, m-, p-isomers)	2.36
Total	14.2^a

a) Not all HAPs are listed in the table. For a listing of all HAPs see the supporting spreadsheet.

Post Project Potential to Emit

The following table presents the post project potential to emit for criteria pollutants from all emissions units at the facility as verified by DEQ staff. see TRIM record #2017AAG267 for a detailed presentation of the calculations of emissions from each emissions unit.

Table 4 POST PROJECT POTENTIAL TO EMIT FOR CRITERIA POLLUTANTS

Emissions Unit	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		Lead	
	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	lb/hr ^a	T/yr ^b	lb/hr	T/yr
Paint spray booths and preparation stations	0.031	0.136	0.000	0.00	0.00	0.00	0.00	0.00	4.56	19.97	0	0
Paint spray booth heaters ^c	0.015	0.02	0.002	0.01	0.185	0.2	0.079	0.09	0.011	0.02	1E-6	2E-6
Post-Project Totals	0.05	0.16	0.01	0.01	0.94	0.20	0.08	0.09	4.57	19.99	1E-6	2E-6

- a) Controlled average emission rate in pounds per hour is a short-term average, based on the proposed daily operating schedule and maximum hourly emission rate estimates.
- b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.
- c) Estimates provided in this summary table are for heater(s) with heat input capacity of 10 MMBtu/hr (combined), while the proposed heater(s) may be of lesser capacity.

The following table presents the post project Potential to Emit for HAP pollutants from all emissions units at the facility as determined by DEQ staff. The DEQ Automotive Coating EI spreadsheet (see TRIM record #2017AAG267) was used to determine post project Potential to Emit for HAP pollutants.

Table 5 POST PROJECT POTENTIAL TO EMIT FOR HAP

HAP Pollutants	PTE (T/yr)
Ethyl benzene	0.61
Methyl Isobutyl Ketone (MIBK)	1.26
Methylene Diisocyanate	0.0124
Naphthalene	2.34
Toluene	1.92
Styrene	2.51
Xylene (o-, m-, p-isomers)	2.36
Total	14.24^a

- a) Not all HAPs are listed in the table. For a listing of all HAPs see the supporting spreadsheet.

Change in Potential to Emit

The project's change in Potential to Emit is used to determine if a public comment period may be required or if emissions modeling may be required, and to determine the processing fee per IDAPA 58.01.01.225.

The following table presents the change in the Potential to Emit for criteria pollutants as a result of this project.

Table 6 CHANGES IN POTENTIAL TO EMIT FOR CRITERIA POLLUTANTS

Emissions Unit	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		Lead	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project PTE	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0	0
Post Project PTE	0.05	0.16	0.01	0.01	0.94	0.20	0.08	0.09	4.57	19.99	1E-6	2E-6
Changes in PTE	0.05	0.16	0.01	0.01	0.94	0.20	0.08	0.09	4.57	19.99	1E-6	2E-6

Non-Carcinogenic and Carcinogenic TAPs Potential to Emit

Because of the daily coating material use limits imposed by DEQ and agreed to by the facility in applying for this Automotive Coating Operations General Permit, no emission screening levels (EL) specified in IDAPA 58.01.01.585 or 586 are expected to be exceeded by the facility (see TRIM record #2017AAG267).

Ambient Air Quality Impact Analyses

Because of the daily coating material use limits imposed by DEQ and agreed to by the facility in applying for this Automotive Coating Operations General Permit, it was determined whether the PTE for the automotive coating operations exceeded DEQ modeling guideline thresholds. The following table compares the post-project facility-wide annual emissions to the DEQ modeling guideline thresholds (per the State of Idaho Air Quality Modeling Guideline, 12/31/2002).

Table 7 PTE FOR CRITERIA POLLUTANTS COMPARED TO DEQ MODELING GUIDELINE THRESHOLDS

Pollutant	PTE (T/yr) or lb/hr if listed	DEQ Modeling Guideline Thresholds (T/yr) or lb/hr if listed	Exceeds Modeling Guideline Threshold?
PM ₁₀	0.16 or 0.05 lb/hr	1 or 0.2 lb/hr	No
PM _{2.5}	0.16 or 0.05 lb/hr	0.35 and 0.054 lb/hr	No
SO ₂	0.01	1	No
NO _x	0.94	1	No
CO	0.09 lb/hr	14 lb/hr	No
Lead	1E-06 or 0.0072 lb/mo	0.6 or 100 lb/month	No

Therefore the automotive coating operation did not require criteria pollutant modeling.

As presented previously in the DEQ Automotive Coatings EI Spreadsheet (see TRIM record #2017AAG267), there are no TAP which exceeded the pounds per hour screening emission levels (EL) provided in IDAPA 58.01.01.585 and .586. Therefore the automotive coating operation did not require TAP modeling.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

Dennis Dillon Automotive is located in Ada County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

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 ≥ 10 T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions ≥ 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 ≥ 8 T/yr of a single HAP or ≥ 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 ≥ 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 ≥ 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 8 Regulated Air Pollutant Facility Classification

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	6.81	0.16	100	B
PM ₁₀	6.81	0.16	100	B
PM _{2.5}	6.81	0.16	100	B
SO ₂	0.03	0.01	100	B
NO _x	0.98	0.2	100	B
CO	0.42	0.09	100	B
VOC	20	20	100	B
HAP (single)	2.51	2.51	10	B
HAP (total)	14.24	14.24	25	B
Pb	2E-6	2E-6	100	B

Permit to Construct (IDAPA 58.01.01.201)

An application was submitted requesting a permit to construct the proposed facility. Therefore, 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)

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

Visible Emissions (IDAPA 58.01.01.625)

The emissions from the automotive coating process are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition .

Rules for the Control of Odors (IDAPA 58.01.01.775-776)

The facility is subject to the general restrictions for the control of odors from the facility. This requirement is assured by Permit Conditions and .

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

IDAPA 58.01.01.006.118 defines a Tier I source as “any source located at a major facility as defined in Section 008.” IDAPA 58.01.01.008.10 defines a major facility as either:

- The facility emits or has the potential to emit ten (10) tons per year (T/yr) or more of any hazardous air pollutant, other than radionuclides, or
- The facility emits or has the potential to emit twenty-five (25) T/yr or more of any combination of any hazardous air pollutants, other than radionuclides.

Uncontrolled HAP emissions were calculated by using the DEQ Automotive Coating EI spreadsheet (see TRIM record #2017AAG267) and setting paint use to 4.0 gallons per day and setting bed liner component B use to 4.0 gallons per day (as limited by the permit). Then worst-case HAP emissions were determined for all paints listed in the spreadsheet. Emissions were assumed to occur 365 days per year as a worst-case assumption.

The following table compares the post-project facility-wide annual worst-case uncontrolled emission rate for all HAP emitted by the facility to the HAP Major Source thresholds in order to determine if the facility is a HAP Major Source.

Table 9 PTE FOR HAP COMPARED TO MAJOR SOURCE THRESHOLDS

HAP Pollutants	PTE (T/yr)	Major Source Threshold (T/yr)	Exceeds the Major Source Threshold?
Ethyl benzene	0.61	10	No
Methyl Isobutyl Ketone (MIBK)	1.26	10	No
Methylene Diisocyanate	0.0124	10	No
Naphthalene	2.34	10	No
Toluene	1.92	10	No
Styrene	2.51	10	No
Xylene (o-, m-, p-isomers)	2.36	10	No
Total	14.24	25	No

As presented in the preceding table the PTE for each HAP is less than 10 T/yr and the PTE for all HAP combined is less than 25 T/yr. Therefore, this facility is not a HAP Major Source subject to Tier I permitting requirements.

As discussed previously Dennis Dillon Automotive is located in Ada County, which is designated as unclassifiable/attainment for PM_{2.5}, PM₁₀, SO₂, NO_x, CO, and Ozone for federal and state criteria air pollutants. Therefore, the following table compares the post-project facility-wide annual PTE for all criteria pollutants emitted by the source to the applicable criteria pollutant Major Source thresholds in order to determine if the facility is a criteria pollutant Major Source.

Table 10 PTE FOR CRITERIA POLLUTANTS COMPARED TO MAJOR SOURCE THRESHOLDS

Criteria Pollutants	PTE (T/yr)	Major Source Threshold (T/yr)	Exceeds the Major Source Threshold?
PM ₁₀	0.16	100	No
SO ₂	0.01	100	No
NO _x	0.2	100	No
CO	0.09	100	No
VOC	20	100	No

As presented in the preceding table, the PTE for each criteria pollutant is less than 100 T/yr. Therefore, this facility was not classified as a criteria pollutant major source subject to Tier I permitting requirements.

PSD Classification (40 CFR 52.21)

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 were not applicable.

NSPS Applicability (40 CFR 60)

The facility was not subject to any NSPS requirements.

NESHAP Applicability (40 CFR 61)

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

MACT Applicability (40 CFR 63)

40 CFR 63, Subpart HHHHHH National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

40 CFR 63.11169 What is the purpose of this subpart?

In accordance with §63.11169, subpart HHHHHH establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in auto body refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations.

40 CFR 63.11170 Am I subject to this subpart?

In accordance with §63.11170(a), this automotive coating operation is subject to this subpart because the facility will be operated as an area source of HAP. The facility is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. In addition, the facility will perform one or more activities listed in this section, including spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations.

40 CFR 63.11171 How do I know if my source is considered a new source or an existing source?

In accordance with §63.11171(b), the automotive coating operation is the collection of mixing rooms and equipment; spray booths, curing ovens, and associated equipment; spray guns and associated equipment; spray gun cleaning equipment; and equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint. Paint stripping was not proposed as a business activity.

In accordance with §63.11171(c), this automotive coating operation is an existing source because it commenced construction prior to September 17, 2007, by installing new paint stripping or surface coating equipment, and the new surface coating equipment will be used at a source that was actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

40 CFR 63.11172 When do I have to comply with this subpart?

In accordance with §63.11172(a)(2), because the initial startup of the facility occurred prior to January 9, 2008, the compliance date is January 10, 2011.

40 CFR 63.11173 What are my general requirements for complying with this subpart?

Because the facility has not proposed paint-stripping activities, the requirements of §63.11173(a) through (f) are not applicable. Because the facility is an automotive coating operation, in accordance with §63.11173(e), the permittee must meet the requirements in paragraphs (e)(1) through (e)(5) of this section.

In accordance with §63.11173(f), each owner or operator of an affected automotive coating operation must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

In accordance with §63.11173(g), as required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

Compliance with these requirements is assured by Permit Condition .

40 CFR 63.11174..... What parts of the General Provisions apply to me?

In accordance with §63.11174(a), Table 1 of this subpart shows which parts of the general provisions in Subpart A apply. Compliance with these requirements is assured by Permit Condition .

In accordance with §63.11174(b), an owner or operator of an area source subject to this subpart is exempt from the obligation to obtain a permit under 40 CFR part 70 or 71 provided that a permit under 40 CFR 70.3(a) or 71.3(a) is not required for a reason other than becoming area source subject to this subpart. This permit application and permitting action involve a permit to construct, and will not utilize the requirements and procedures in IDAPA 58.01.01.300-399 for the issuance of Tier I operating permits.

40 CFR 63.11175..... What notifications must I submit?

In accordance with §63.11175(a), because the facility is a surface coating operation subject to this subpart, the initial notification required by §63.9(b) must be submitted. For this existing operation, the initial notification must be submitted no later than on or before January 11, 2011.

In accordance with §63.11175(b), because the facility is an existing source, the permittee is not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided the permittee was able to certify compliance on the date of the initial notification, as part of the initial notification, and the permittee's compliance status has not since changed. The permittee must submit a notification of compliance status on or before March 11, 2011. The permittee is required to submit the information specified in paragraphs (b)(1) through (4) of this section with the notification of compliance status. Compliance with these requirements is assured by Permit Condition .

40 CFR 63.11176..... What reports must I submit?

In accordance with §63.11176(a), because the permittee is an owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, the permittee is required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), notification of compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

Compliance with these requirements is assured by Permit Condition .

Because the facility has not proposed to conduct paint stripping operations, the MeCl minimization plan requirements are not applicable (see Permit Condition).

40 CFR 63.11177..... What records must I keep?

In accordance with §63.11177, because the permittee is the owner or operator of a surface coating operation, the permittee must keep the records specified in paragraphs (a) through (d), (g), and (h) of this section. Because the permittee has not proposed to conduct paint stripping operations, the requirements of paragraphs (e) and (f) of this section are not applicable. Compliance with these requirements is assured by Permit Condition .

40 CFR 63.11178.....In what form and for how long must I keep my records?

In accordance with 40 CFR 63.11178(a) because the permittee is the owner or operator of an affected source, the permittee must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period. Compliance with these requirements is assured by Permit Condition .

40 CFR 63.11179..... Who implements and enforces this subpart?

In accordance with §63.11179(a), this subpart can be implemented and enforced by the U.S. Environmental Protection Agency (EPA), or a delegated authority. At the time of this permitting action, the EPA has not delegated authority to the State of Idaho. However, IDAPA 58.01.01.107.03.i incorporates by reference all Federal Clean Air Act requirements including 40 CFR 63, Subpart HHHHHH. Therefore, the requirements of this subpart have been placed in the permit.

40 CFR 63.11180..... What definitions do I need to know?

Terms used in this subpart are defined in accordance with §63.11180.

Permit Conditions Review

This section describes the permit conditions for this initial permit.

Permit Condition 1 establishes the permit to construct scope.

Table 1.1 provides a description of the regulated sources and the control equipment used at the facility.

Permit Condition 2.1 provides a process description of the facility.

Permit Condition 2.2 provides a description of the control devices used at the facility.

Permit Condition 2.3 establishes hourly and annual emission limits for PM₁₀ and VOC emissions from the automotive coating operation.

Permit Condition 2.4 incorporates opacity limits for the paint booth stacks, vents, or functionally equivalent openings associated with the automotive coating operation in accordance with IDAPA 58.01.01.625.

Permit Condition 2.5 incorporates odor limits that the permittee shall not allow, suffer, cause, or permit the emission of odorous gasses, liquids, or solids to the atmosphere in such quantities as to cause air pollution in accordance with IDAPA 58.01.01.776.

Permit Condition 2.6 establishes that only natural gas is allowed to be used as fuel in the paint spray booth heater(s) as proposed by the applicant.

Permit Condition 2.7 establishes that the facility will not use MeCl to remove paint from vehicles at the facility. This was done because MeCl was not proposed by the applicant to be used at this facility and the emissions were not included in the DEQ Automotive Coating EI Spreadsheet (see TRIM record #2017AAG267). In addition, Subpart HHHHHH has additional requirements for facilities that use MeCl to remove paint as mentioned previously in the discussion of Subpart HHHHHH in the MACT Applicability Section.

Permit Condition 2.8 establishes a daily use limit for all coating materials used in the automotive coating process as proposed by the applicant. This limit was established to ensure compliance with the PM₁₀ and VOC emission limits specified in Permit Condition and the TAP emission estimates in the DEQ Automotive Coating EI Spreadsheet (see TRIM record #2017AAG267).

Permit Condition 2.9 excludes bed liner component B coatings from each daily usage total. For those bed liner coatings analyzed, component B coatings did not contain substances which would result in emissions of regulated TAP. (Use of component B coatings did result in additional VOC emissions which were included in the emission inventories; see Appendix A.) Component A coatings (also referred to as the “iso” component) are counted toward the daily usage limit in Permit Condition because these coatings contain isocyanates (including HDI and/or MDI) which result in the emissions of regulated TAP.

Permit Condition 2.10 incorporates the Subpart HHHHHH requirement that the permittee conduct all automotive coating operations in the paint spray booth or preparation station with the filters in place, exhaust fan(s) operating, and door(s) or curtain(s) closed, that the operation shall use a HVLP spray gun, and that the permittee shall maintain and operate the paint spray booth and preparation station exhaust filter systems in accordance with the manufacturer's specifications. This condition also defines the requirements for paint spray booths and preparation stations.

Permit Condition 2.11 establishes that the permittee shall maintain records of all odor complaints received, perform appropriate corrective actions, and maintain records of corrective actions taken at the facility for the automotive coating process. This was required because automotive operation operations are expected to have odors that might be offensive to their immediate neighbors.

Permit Condition 2.12 establishes that the permittee shall maintain material purchase records and Material Safety Data Sheets (MSDS) for the automotive coating process. This condition was placed in the permit to ensure compliance with the Coating Materials Use Limit permit condition.

Permit Condition 2.13 establishes that the permittee shall maintain daily usage records of pre-treatment wash primers, primers, topcoats, clear coats, thinners/reducers, undercoatings, and bed liner components containing isocyanates which are used for the automotive coating process. This condition was placed in the permit to ensure compliance with the Coating Materials Use Limit permit condition.

Permit Condition 2.14 establishes that the permittee shall maintain records as required by the General Provision recordkeeping requirements.

Permit Condition 2.15 incorporates requirements that will allow the facility to comply with the general operating requirements of 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Coating Operations unless the facility is exempt from HHHHHH.

Permit Condition 2.16 incorporates requirements that will allow the facility to comply with the monitoring and recordkeeping requirements of 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Coating Operations unless the facility is exempt from HHHHHH.

Permit Condition 2.17 incorporates requirements that will allow the facility to comply with the initial notification and reporting requirements of 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Coating Operations unless the facility is exempt from HHHHHH.

Permit Condition 2.18 incorporates requirements that will allow the facility to comply with the annual notification and reporting requirements of 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Coating Operations unless the facility is exempt from HHHHHH.

Permit Condition 2.19 establishes that the federal requirements of 40 CFR Part 63 were incorporated by reference into the requirements of this permit per current DEQ guidance and as provided in IDAPA 58.01.01.107.

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 were no comments on the application and there was not a request for a public comment period on DEQ's proposed action. Refer to the Application Chronology for public comment opportunity dates.

APPENDIX A – EMISSION INVENTORIES

Coating Operation Emissions Calculations:

A daily coatings material use limit needs to be established for Automotive Coating operations that demonstrates compliance with State Law. Specifically, compliance with IDAPA 58.01.01.585 and .586 for toxic air pollutants (TAPs) needs to be determined. Therefore, DEQ staff created the DEQ Automotive Coating EI spreadsheet (see TRIM record #2017AAG267). This spreadsheet contains paints from two different manufacturers of paints used in the automotive coating industry and multiple paint systems for each brand. The paint brands chosen were based upon discussions with a national paint distributor with several stores throughout the state of Idaho. The TAPs data entered in the spreadsheet was taken from the MSDS for the paints listed. Included in the calculations was a safety factor of 19% since all paints available were not analyzed. With this safety factor it is reasonably presumed that the data represents all available automotive coatings. The spreadsheet was then used to demonstrate that with 4.0 gallons per day of coating use, the EL listed in IDAPA 58.01.01.585 and .586 would not be exceeded for any of the coatings listed in the spreadsheet. The 4.0 gallons per day of coating was then used to determine worst-case PM₁₀ and VOC emissions from Automotive Coating operations (see TRIM record #2017AAG267).

Spray booth emissions of methylene diisocyanate (MDI) resulting from the application of the “iso” component coating during bed lining coating operations were estimated using the equation and assumptions from Section 19.0 of the MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry.¹ In this equation it was assumed that 100% of the “iso” component sprayed was MDI ($k_{MDI} = 1.0$), that the combined spray and dry time to apply up to 4 gallons of MDI-based “iso” component was 4 hours or less per day, that “iso” spray coatings were applied 365 days per year, and that “iso” spray coatings were applied at less than 95°F. Although spray booth filtration is required, no additional removal or reduction of MDI emissions was assumed (0% control efficiency).

Uncontrolled emissions are based upon normal operation of the facility of 2,080 hrs/yr (8 hrs/day x 260 days/yr, normal business hours) with all coating operation occurring during this time. Since there is inherent prep time (the time spent preparing the automobile for the application of coating) and paint drying time (the time the automobile spends in the booth with the burner operating to facilitate hardening of the coating) this was considered to be the worst-case maximum for which emissions could occur.

Therefore, uncontrolled annual PM emissions are calculated using the annual PTE as calculated and backing out the 98% control efficiency of the filter system.

Uncontrolled annual PM₁₀ emissions from the coating operation are calculated as:

$$\text{Uncontrolled Annual PM}_{10} \text{ emissions} = \text{PM}_{10} \text{ PTE (T-PM}_{10}\text{/yr)} \div (1 - \text{Filter CE})$$

$$\text{Uncontrolled Annual PM}_{10} \text{ emissions} = 0.136 \text{ T-PM}_{10}\text{/yr} \div (1 - 0.98) = 6.79 \text{ T-PM}_{10}\text{/yr}$$

Therefore, uncontrolled annual VOC emissions are calculated using the annual PTE as calculated.

Uncontrolled annual VOC emissions are equal to annual PTE as calculated.

$$\text{Uncontrolled Annual VOC emissions} = \text{VOC PTE (T-VOC/yr)}$$

$$\text{Uncontrolled Annual VOC emissions} = 20.04 \text{ T-VOC/yr}$$

Paint Booth Heater Emissions Calculations:

To determine worst-case emissions from the paint booth(s) heater(s) the maximum heat input rating of the burner was assumed to 2.0 MMBtu/hr with operation of 2,080 hrs/yr. See TRIM record #2017AAG267 for the calculation details.

¹ MDI/Polymeric MDI Emissions Reporting Guidelines for the Polyurethane Industry, Alliance for the Polyurethanes Industry (API), 2004.