



Air Quality Permitting Response to Public Comments

December 26, 2018

Permit to Construct No. P-2018.0005

Project No. 61993

**Trinity Trailer Mfg., Inc. - Eisenman
Boise, Idaho**

Facility ID No. 001-00341

Prepared by:
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AIR QUALITY DIVISION

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct for Trinity Trailer Mfg., Inc. - Eisenman from July 19 through August 20, 2018, in accordance with IDAPA 58.01.01.209.01.c. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: <http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

Comment 1:

Comment 1 Section 3.6 Laser Cutting Throughput Limit

In our June 28, 2018 letter we commented to the IDEQ that the initial version of the draft permit restricted plasma laser cutting to only stainless steel. We provided a revised emission inventory that demonstrates that cutting 17,000 lbs. aluminum and 17,000 lbs. of mild steel per year complies with applicable standards and requested that these amounts of aluminum and mild steel be added as limits. The public comment period-emission inventory includes these emission estimates but does not include the limits. We propose the following revisions to Section 3.6 to clarify the amounts of aluminum and mild steel cuttings that match the emission inventory.

Section 3.6 Laser Cutting Throughput Limit

For each material type, the amount of material removed by laser cutting shall not exceed the annual limit listed in the following table:

Table 3.3 Amount of Material Removed by Laser Cutting

Type	Usage (lb/yr) ¹
Stainless Steel	3,393
<u>Aluminum</u>	<u>17,000</u>
<u>Mild Steel</u>	<u>17,000</u>

¹ Based on 12 months rolling period

Response 1: Requested change is made.

Comment 2: Revise Permit Conditions 3.7, 4.5 and 5.7 to allow using alternate materials that emit new TAP or emit TAP at higher rates than the ones in the emissions inventory (EI) provided in the applicant. Refer to Appendix of this document for more details on this request.

Response 2: Permit Conditions 3.7, 4.5 and 5.7 are revised to allow for the use of alternate materials that may emit new toxic air pollutants (TAP) or TAPs emitted at higher rates than what

were evaluated in this permitting action – see also Appendix A of the SOB for the TAPs summary.

In order to provide operational flexibility for alternative materials used in abrasive blasting, welding and coating operations, Section 6 of the permit was developed that ensures compliance with the emissions limits in the permit and ensures compliance with the TAP standards in IDAPA 58.01.01.585 and 586 when using alternative materials. The section includes monitoring and recordkeeping requirements for PM₁₀, PM_{2.5}, VOC, HAP, and TAPs. The facility will track and estimate the alternative materials emissions to determine compliance with the emissions limits in the permit and the applicable TAP screening emission levels. If emissions due to alternative materials would exceed any emissions limit in the permit, or any applicable screening emissions level, the applicant would need to modify their permit to allow for the new material.

Comment 3: TAP Emissions

Table 6 in the Statement of Basis provides a summary of potential to emit (PTE) for emission increases of toxic air pollutants (TAPs). It appears that DEQ is reporting preproject and post-project values as “controlled hourly emissions.” We question the appropriateness of the reported values given that a number of emission sources lack any emission control equipment. Thus, it seems inappropriate to utilize “controlled hourly emissions” values if the sources of the emissions are not in fact controlled in any manner. We encourage DEQ to recalculate pre- and post-project PTE for TAPs using an appropriate emission factor.

Response 3: Table 6 of the SOB provides the potential to emit (PTE) of toxic air pollutant (TAP) emissions for the facility. Because this is an initial permit to construct, pre-project emissions are identified as zero. Post project emissions are calculated based on the “controlled emission rate”, defined in IDAPA 58.01.01.210.02.c, as “The controlled emissions rate of a toxic air pollutant from a source or modification is calculated using the maximum capacity of the source or modification under its physical and operational design with the effect of any physical or operational limitation that has been specifically described in a written and certified submission to the Department.”

All emission factors used to calculate the controlled emission rates for each TAP have been reviewed and determined to be appropriate for each source.

Comment 4: According to DEQ’s Statement of Basis, the hazardous air pollutants (HAPs) emitted from the paint booth and solvent recycling operation are regulated by 40 CFR 63 Subpart HHHHHH. DEQ presumes that EPA evaluated the potential emission of 187 HAPs from operations such as this one that fall under the regulations of 40 CFR 63. DEQ cites this as justification for not conducting a further review related to HAPs. However, we are confused by this statement, because immediately following this statement in the Statement of Basis is Table 7, which summarizes the potential to emit (PTE) values for HAPs from all emission units.

We ask DEQ to clarify if Table 7 reflects HAPs PTE from all emission sources at the facility, or only those that are not regulated under 40 CFR 63 Subpart HHHHHH. Further, we are curious if DEQ reached out to the EPA to validate their presumption that the 187 HAPs were considered as part of 40 CFR 63, and request that they please provide a summary of the correspondence between DEQ and EPA regarding this facility’s permit.

Response 4: For TAPs:

DEQ presumes that EPA evaluated the 187 HAPs when developing the emission standards for new, modified or existing stationary sources regulated by 40 CFR Part 63; therefore,

no further review is required under IDAPA 58.01.01.210 for these pollutants for sources subject to 40 CFR Part 63, including sources specifically exempted within the subpart. Since coating operations are covered by 40 CFR Part 63, Subpart HHHHHH, DEQ only evaluated those TAPs from coating operations that are not one of the 187 HAPs. It must also be noted that all TAPs from welding, abrasive blasting and cutting operations were evaluated in accordance with IDAPA 58.01.01.210 as these sources are not covered by any 40 CFR 63 Subpart. DEQ did not specifically reach out to EPA staff on this matter, but did rely on the background documents of the NESHAPs to reach this interpretation.

For Hazardous Air Pollutants (HAP):

All HAP emissions from all sources at this facility were calculated to determine the facility classifications for HAPs. As described in Table 7 and Table 8 in the SOB, no single HAP exceeds 10 T/yr and the total of all HAPS are less than 25 T/yr. Therefore, this facility is classified as an area source, or minor source, for HAP emissions.

Comment 5: Low VOC Paint
The paint booth is the most substantial emitter of VOCs from this facility (50.4 T/yr PTE). We are curious if DEQ or the applicant has evaluated or plan to use low-VOC paint. If utilized, low-VOC paint could significantly reduce the emissions of VOCs from the paint booth. If this option was analyzed, we request that DEQ provide details regarding the emissions reductions that would result from utilizing low-VOC as well as the reasoning behind why this was not selected as an emission control device in the draft permit. If this option was not analyzed, we request details as to why that was the case.

Response 5: The applicant did not propose the use of low VOC paints. DEQ evaluated the paints proposed in the application to determine compliance with applicable rules.

Comment 6: Emission Venting Indoors
A number of the emission sources vent back indoors where we presume there will be employees working. If this is the case, we are curious if DEQ has consulted with the Occupational Safety and Health Administration (OSHA) to discuss indoor air quality resulting from the venting of these emission sources. We request that DEQ explain the extent of their consideration for indoor air quality while drafting this permit, and include copies of or references to any supporting material relied upon to demonstrate that indoor air quality will be protective of employee health.

Response 6: DEQ evaluates regulated air pollutants and toxic air pollutants emitted to the ambient air. DEQ does not coordinate permitting efforts with OSHA. However, DEQ's permit does state on the front page that this permit "... does not release the permittee from compliance with all other applicable federal, state, tribal, or local laws, regulations, or ordinances..."

Appendix

Public Comments Submitted for

Permit to Construct No. P-2018.0005

Project No. 61993



August 17, 2018

Email Transmittal to: Shawnee.Chen@deq.idaho.gov

Shawnee Chen
 Idaho Department of Environmental Quality
 1410 North Hilton
 Boise, ID 83706

Re: Public Comment Proposed Permit to Construct
 Trinity Trailer Mfg., Inc. - Eisenman, Boise
 Facility ID No. 001-00341

Dear Ms. Chen:

In accordance with the public comment period for the Draft Proposed Trinity Trailer Mfg. Permit to Construct, and on behalf of Trinity Trailer Mfg., the following comments and proposed revisions to the Draft Permit are submitted.

Comment 1 Section 3.6 Laser Cutting Throughput Limit

In our June 28, 2018 letter we commented to the IDEQ that the initial version of the draft permit restricted plasma laser cutting to only stainless steel. We provided a revised emission inventory that demonstrates that cutting 17,000 lbs. aluminum and 17,000 lbs. of mild steel per year complies with applicable standards and requested that these amounts of aluminum and mild steel be added as limits. The public comment period-emission inventory includes these emission estimates but does not include the limits. We propose the following revisions to Section 3.6 to clarify the amounts of aluminum and mild steel cuttings that match the emission inventory.

Section 3.6 Laser Cutting Throughput Limit

For each material type, the amount of material removed by laser cutting shall not exceed the annual limit listed in the following table:

Table 3.3 Amount of Material Removed by Laser Cutting

Type	Usage (lb/yr) ¹
Stainless Steel	3,393
<u>Aluminum</u>	<u>17,000</u>
<u>Mild Steel</u>	<u>17,000</u>

¹ Based on 12 months rolling period

Comment 2 Section 3.7 Welding Rod Type

In our June 28, 2018 letter we commented that the “equivalent electrode” provision—
 “emissions are lower than the listed welding rod” is difficult to apply. Demonstrating that
 the new welding rod *emissions are lower* could be interpreted to mean not a single TAP
 emission higher, even if other TAPs were lower. We propose comparing the potential new
 electrode’s emissions to the TAP 585/586 standards. We suggest revising Section 3.7 using a
 permit condition modeled after the IDEQ-approved Alternate Coating Scenario,¹ described in
 Comment 4 and as shown below.

3.7 Welding Rod Type

The permittee shall use the welding electrode rods ~~or the alternative equivalent electrode rods as~~ listed in the
 following table or an Alternate Welding Rod Scenario:

Table 3.4 Welding Rod Type

1.1	Welding Rod Type
Type	Quantum Arc ER308-D2 Hobart
	Lincoln BLUE MAX, mig 308LSi

~~Alternate equivalent welding electrode rod may be used if it is demonstrated that the types and amounts of
 the alternate welding electrode rod result in emissions equal or lower than the rods listed in Table 3.4. Refer
 to Appendix A of SOB for the components of the welding electrode rods listed in Table 3.4. the permittee
 follows the procedures of this section. The permittee shall not use any new Welding Usage Scenario until
 welding TAP compliance and welding Emission Limit compliance have been demonstrated for that Scenario
 according to the procedures below....[insert IDEQ Alternate Usage permit conditions, as listed in Comment
 4, below]~~

Comment 3 Section 4.5 Abrasive Blasting Media Usage Limits

Similar to Comment 2 above, the “equivalent abrasive blasting media” provision—
 “emissions equal or lower” is difficult to apply. Demonstrating that a new abrasive’s
emissions are lower could be interpreted to mean not a single TAP emission higher, even if
 other TAPs were lower. We propose comparing the potential new abrasive’s emissions to the
 TAP 585/586 standards. We suggest revising Section 4.5 using a permit condition modeled
 after the IDEQ-approved Alternate Coating Scenario described in Comment 4 and as shown
 below.

4.5 Abrasive Blasting Media Usage Limits

- The daily usage of the abrasive blasting media shall not exceed 9,472 lb/day.
- The annual usage of the abrasive blasting media shall not exceed 1,231 ton per 12 calendar months rolling period.

¹ Idaho Department of Environmental Quality, Permit to Construct, P-2013.0056, Mobile Component, Inc.,
 August 9, 2018



~~An alternate equivalent abrasive blasting media may be used if it is demonstrated that the alternate equivalent abrasive blasting media results in emissions equal or lower than the abrasive blasting media used in this permit analysis. Refer to Appendix A of SOB for the components of the abrasive blasting media used for this permit analysis. The permittee follows the procedures of this section. The permittee shall not use any new Abrasive Usage Scenario until abrasive TAP compliance and abrasive Emission Limit compliance have been demonstrated for that Scenario according to the procedures below ... [insert IDEQ Alternate Usage permit conditions, as listed in Comment 4, below]~~

Comment 4 Section 5.7 Coating Material Formulations

Similar to Comments 2 and 3, above, the "equivalent coating" provision is difficult to apply. Trinity Trailer should be able to substitute coatings as long as it can demonstrate that emissions comply with criteria, TAPs, and HAPs standards. Comparing different coatings and mixtures of coatings to original coatings is difficult. Comparing an Equivalent's emissions to the 585/586 standards would be easier to apply and would satisfy PTC requirements.

We request using a permit condition modeled after the IDEQ-approved Alternate Coating Scenario¹ and as shown below. In addition, we request that only the first use of a new Alternate Coating Scenario be annually reported (see *Coating Usage Scenario Reporting*, below). This would provide the IDEQ notification and opportunity to review, without burdening the permittee with annual reporting of information that does not change. Records would be maintained on-site.

5.7 Coating Material Formulations

~~The permittee shall only use coating materials listed in Table 5.2 or their respective equivalent coating material. Refer to Appendix A of SOB for the material components.~~

~~For the purposes of this permit condition, "equivalent" is defined as:~~

~~• a solid and VOC content of a new paint material, in lb/gal, as listed in the SDS, is equal to or less than the solid and VOC content, as listed in the SDS, of the corresponding paint material listed in Table 5.2, and~~

~~• a wt% of metals, HAP, and TAP multiplying the paint density, in lb/gal, as listed in the SDS, of a new paint material, is equal to or less than the wt% of metals, HAP, and TAP multiplying the paint density, in lb/gal, as listed on the SDS, of the corresponding paint material listed in Table 5.2 an alternate coating material that complies with the Alternate Daily Coating Usage Scenario as described below.~~

Alternate Daily Coating Usage Scenarios

~~Unless using a coating material for which compliance has previously been determined in Table 5.2 (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 procedures below.~~

Propose a Daily Coating Usage Scenario

~~Prior to using or implementing a new Daily Coating Usage Scenario:~~

- ~~• 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/PM2.5, VOC, and all TAP listed in Table 5.3 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).

Estimate Coating TAP Emissions

TAP emissions shall be estimated for all TAP listed in Table 5.3:

- 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 X.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.
- TAP content (lb/gal) of a coating is specified on the Safety Data Sheet (SOS) for that coating, or shall be calculated by multiplying the weight percentage of TAP (%) by the density (lb/gal) of the coating from the SOS.
- For TAP content, if a range is presented on the SOS for a coating, the highest value of the range shall be used when estimating emissions, unless documented evidence from the manufacturer or supplier demonstrates otherwise.
- When the TAP content is listed as below detection on SOS 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, unless documented evidence from the manufacturer or supplier demonstrates otherwise.
- When the TAP content cannot be determined from SOS or other documentation, the TAP content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.

Demonstrate Coating TAP Compliance

For each Daily Coating Usage Scenario, the permittee shall estimate TAP emissions and compare against the TAP Screening Emission Rates in Table 5.3:

- The permittee shall compare estimated TAP emissions for all coatings against the Screening Emission Rates in Table 5.3. 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 5.3. 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 5.3 TAP Screening Emission Rates and Modeled Concentration Limits
(list TAP lbs./day and mg/m³ values, not reprinted here)



Demonstrate Coating Emission Limit Compliance

For each Daily Coating Usage Scenario, emissions from all coating operations shall be estimated and compared against the Coating Emission Limits in Table 5.3:

- PM10/PM25 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 (1) minus the transfer efficiency and by one (1) minus the filter control efficiency when control equipment will be applied to such emissions.
- 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).
- 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).
- 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, unless documented evidence from the manufacturer or supplier demonstrates otherwise
- When the solids content, VOC content, or HAP content is listed as below detection on SDS or other documentation, the HAP content shall be assumed equal to the coating density divided by 100 (i.e., 1 % of density in lb/gal) when estimating emissions, unless documented evidence from the manufacturer or supplier demonstrates otherwise
- 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 5.3. The permittee shall not use or implement any Scenario that exceeds a Coating Emission Limit.

Monitoring, Recordkeeping, and Reporting Requirements:

Coating Usage Scenario Monitoring

Each calendar day on which coating materials are 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.

Coating Material Usage Recordkeeping

- Each calendar month on which approved coating materials are used, the permittee shall collect and maintain records of the quantity of each material used, including but not limited to primers, basecoats, sealers, thinners, solvents, and adhesives to demonstrate compliance with Monthly Coating Usage Limits.
- 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, basecoats, sealers, thinners, solvents, and adhesives to demonstrate compliance with Specialty Adhesive 2016 or Alternate Daily Coating Usage Limits.

Coating Material Purchase and Safety Data Sheet Recordkeeping

For each coating material used at the facility, including but not limited to primers, basecoats, sealers, thinners, solvents, and adhesives, the permittee shall record and maintain the following records:



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- Material purchase records
- Safety Data Sheets (SDS)

Coating Usage Scenario Reporting

The permittee shall submit a report by May 1st on the use of a new Daily Coating Usage Scenario 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. Documentation should be in sufficient detail, including documentation of all calculations 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

Thank you for the opportunity to provide comment on the Draft Permit to Construct. Please do not hesitate to contact me with any questions you may have. I may be reached at (208) 345-7222 or via Email at mtorf@torf.us.

Very truly yours,
TORF Environmental Management



Mark A. Torf
President

cc: Dean Hearst, Trinity Trailer Mfg.





3459 E. Boulder Heights Dr. Boise, Idaho 83712 208.345.7222 www.torf.us

September 10, 2018

Email Transmittal to: Shawnee.Chen@deq.idaho.gov

Shawnee Chen
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

Re: Public Comment Follow-up - Proposed Permit to Construct
Trinity Trailer Mfg., Inc. - Eisenman, Boise
Facility ID No. 001-00341

Dear Ms. Chen:

In accordance with your request, the document enclosed shows our proposed alternate material use permit conditions for welding and abrasive blasting, mirrored after the conditions previously proposed for spray coating.

The proposed permit conditions are modeled after the IDEQ-approved Alternate Coating Scenario¹¹ and as shown in the document. The proposed additions to the Draft Permit are emphasized with underline-format and the proposed deletions are highlighted in strike-out format. In addition, we request that only the first use of a new Alternate Coating Scenario be annually reported (see *Coating Usage Scenario Reporting*, below). This would provide the IDEQ notification and opportunity to review, without burdening the permittee with annual reporting of information that does not change. Records would be maintained on-site.

Thank you for the opportunity to provide comment on the Draft Permit to Construct. Please do not hesitate to contact me with any questions you may have. I may be reached at (208) 345-7222 or via Email at mtorf@torf.us.

Very truly yours,
TORF Environmental Management

A handwritten signature in black ink, appearing to read "Mark A. Torf", is written over the typed name.

Mark A. Torf
President

Enc.

cc: Dean Hearst, Trinity Trailer Mfg.

¹ Idaho Department of Environmental Quality, Permit to Construct, P-2013.0056, Mobile Component, Inc., August 9, 2018.

3.7 Welding Rod Type

The permittee shall use the welding electrode rods listed in the following table or an Alternate Welding Rod Scenario:

Table 3.4 Welding Rod Type

1.1 Welding Rod Type	
Type	
	Quantum Arc ER80S-D2 Hobart
	Lincoln BLUE MAX, mig 308LSi

Alternate welding rod may be used if the permittee demonstrates compliance with TAP Screening Rates and Modeled Concentration Emission Limits ~~it is demonstrated that the types and amounts of the alternate welding electrode rod result in emissions equal or lower than the rods listed in Table 3.4. Refer to Appendix A of SOB for the components of the welding electrode rods listed in Table 3.4.~~ The permittee shall not use any new Welding Usage Scenario until welding TAP compliance and Welding Emission Limit compliance have been demonstrated for that Scenario according to the procedures below.

Alternate Daily Welding Rod Usage Scenarios

Unless using a welding rod for which compliance has previously been determined in Table 3.4 (such as when new or reformulated welding rod materials are introduced), each day before a welding rod is used the permittee shall follow the procedures of this section. The permittee shall not use any new Daily Welding Rod Usage Scenario until welding TAP compliance and welding Emission Limit compliance have been demonstrated for that Scenario according to the procedures below.

Propose a Daily Welding Rod Usage Scenario

Prior to using or implementing a new Daily Welding Rod Usage Scenario:

- The permittee shall propose and record maximum daily welding rod usage limits for each welding material that will be used in the Scenario, in pounds per day (lb/day). The permittee shall not use or implement any Scenario that does not have recorded maximum daily welding usage limits.
- The permittee shall estimate emissions of all TAP listed in Table 3.5 for the Scenario (lb/day for each pollutant), using the procedures described below for estimating emissions.
- The permittee shall demonstrate welding material TAP compliance for the Scenario, using the procedures described below for demonstrating welding material TAP compliance. The permittee shall not use or implement any Scenario that does not demonstrate welding TAP compliance.
- The permittee shall demonstrate Welding Rod Emission Limit compliance for the Scenario, using the procedures described below for demonstrating Welding Rod Emission Limit compliance. The permittee shall not use or implement any Scenario that does not demonstrate Welding Emission Limit compliance.
- The daily welding rod usage limits and emission estimates used in determining coating TAP compliance and Welding Emission Limit compliance shall be based on estimated emissions from all welding rod to be used from all welding operations at the facility (i.e., facility-wide).

Estimate Welding Rod TAP Emissions

TAP emissions shall be estimated for all TAP listed in Table 3.5:

- Emissions shall be estimated by multiplying each maximum daily welding rod usage rate (lb/day) by the TAP content (%) of that welding rod, and summing the total emissions from all welding rod materials (lb/day).
- TAP content (%) of a welding rod is specified on the Safety Data Sheet (SDS) for that welding rod or other information provided by the manufacturer.

- For TAP content, if a range is presented on the SDS or other information for a welding rod, the highest value of the range shall be used when estimating emissions, unless documented evidence from the manufacturer or supplier demonstrates otherwise.
- When the TAP content is listed as below detection on SDS or other documentation, the TAP content shall be assumed equal to the detection limit specified, unless documented evidence from the manufacturer or supplier demonstrates otherwise.

Demonstrate Welding TAP Compliance

For each Daily Welding Rod Usage Scenario, the permittee shall estimate TAP emissions and compare against the TAP Screening Emission Rates in Table 3.5:

- The permittee shall compare estimated TAP emissions for all welding rod against the Screening Emission Rates in Table 3.5. 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 Welding Rod Usage Scenario shall not exceed the Modeled Concentration Limits in Table 3.5. 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 3.5 TAP Screening Emission Rates and Modeled Concentration Limits

<u>Regulated TAP</u>	<u>CAS</u>	<u>Particulate?</u>	<u>Screening Emission Rate (lb/day)^(a)</u>	<u>Modeled Concentration Limit (mg/m³)^(b)</u>
<u>Acetone</u>	<u>67-64-1</u>	<u>No</u>	<u>2856</u>	<u>89</u>
<u>Aluminum - Metal and Oxide</u>	<u>7429-90-5</u>	<u>Yes</u>	<u>16.008</u>	<u>0.5</u>
<u>Aluminum - Soluble Salts</u>	<u>7429-90-5</u>	<u>Yes</u>	<u>3.192</u>	<u>0.1</u>
<u>n-Amyl Acetate</u>	<u>628-63-7</u>	<u>No</u>	<u>847.2</u>	<u>26.5</u>
<u>Barium (Soluble Compounds), as Ba</u>	<u>7440-39-3</u>	<u>Yes</u>	<u>0.792</u>	<u>0.025</u>
<u>2-Butoxyethanol</u>	<u>111-76-2</u>	<u>No</u>	<u>192</u>	<u>6</u>
<u>n-Butyl Acetate</u>	<u>123-86-4</u>	<u>No</u>	<u>1135.2</u>	<u>35.5</u>
<u>n-Butyl Alcohol</u>	<u>71-36-3</u>	<u>No</u>	<u>240</u>	<u>7.5</u>
<u>Calcium Carbonate</u>	<u>1317-65-3</u>	<u>Yes</u>	<u>16.008</u>	<u>0.5</u>
<u>Carbon Black</u>	<u>1333-86-4</u>	<u>Yes</u>	<u>5.52</u>	<u>0.175</u>
<u>Cyclohexane</u>	<u>110-82-7</u>	<u>No</u>	<u>1680</u>	<u>52.5</u>
<u>Cyclohexanone</u>	<u>108-94-1</u>	<u>No</u>	<u>160.08</u>	<u>5</u>
<u>Diacetone Alcohol</u>	<u>123-42-2</u>	<u>No</u>	<u>384</u>	<u>12</u>
<u>Dibutyl Phthalate</u>	<u>84-74-2</u>	<u>No</u>	<u>7.992</u>	<u>0.25</u>
<u>o-Dichlorobenzene</u>	<u>95-50-1</u>	<u>No</u>	<u>480</u>	<u>15</u>
<u>Diethyl Phthalate</u>	<u>84-66-2</u>	<u>No</u>	<u>7.992</u>	<u>0.25</u>
<u>Diisobutyl Ketone</u>	<u>108-83-8</u>	<u>No</u>	<u>232.08</u>	<u>7.25</u>
<u>Dimethylphthalate</u>	<u>131-11-3</u>	<u>No</u>	<u>7.992</u>	<u>0.25</u>



<u>Dipropylene Glycol Methyl Ether</u>	<u>34590-94-8</u>	<u>No</u>	<u>960</u>	<u>30</u>
<u>2,6-Di-tert-butyl-p-cresol (butylated hydroxytoluene)</u>	<u>128-37-0</u>	<u>No</u>	<u>16.008</u>	<u>0.5</u>
<u>Ethyl Acetate</u>	<u>141-78-6</u>	<u>No</u>	<u>2239.2</u>	<u>70</u>
<u>Ethyl Alcohol</u>	<u>64-17-5</u>	<u>No</u>	<u>3000</u>	<u>94</u>
<u>Heptane (n-Heptane)</u>	<u>142-82-5</u>	<u>No</u>	<u>2616</u>	<u>82</u>
<u>Iron Oxide Fume (Fe₂O₃) as Fe</u>	<u>1309-37-1</u>	<u>Yes</u>	<u>7.992</u>	<u>0.25</u>
<u>Isobutyl Acetate</u>	<u>110-19-0</u>	<u>No</u>	<u>1120.8</u>	<u>35</u>
<u>Isobutyl Alcohol</u>	<u>78-83-1</u>	<u>No</u>	<u>240</u>	<u>6</u>
<u>Isophorone Diisocyanate</u>	<u>4098-71-9</u>	<u>No</u>	<u>0.144</u>	<u>0.0045</u>
<u>Isopropyl Acetate</u>	<u>108-21-4</u>	<u>No</u>	<u>1663.2</u>	<u>52</u>
<u>Isopropyl Alcohol</u>	<u>67-63-0</u>	<u>No</u>	<u>1567.2</u>	<u>49</u>
<u>Kaolin</u>	<u>1332-58-7</u>	<u>Yes</u>	<u>3.192</u>	<u>0.1</u>
<u>Magnesite</u>	<u>546-93-0</u>	<u>Yes</u>	<u>16.008</u>	<u>0.5</u>
<u>Methacrylic Acid</u>	<u>79-41-4</u>	<u>No</u>	<u>112.08</u>	<u>3.5</u>
<u>Methyl Acetate</u>	<u>79-20-9</u>	<u>No</u>	<u>976.8</u>	<u>30.5</u>
<u>Methyl Ethyl Ketone (MEK)</u>	<u>78-93-3</u>	<u>No</u>	<u>943.2</u>	<u>29.5</u>
<u>Methyl Isoamyl Ketone</u>	<u>110-12-3</u>	<u>No</u>	<u>384</u>	<u>12</u>
<u>Methyl Isobutyl Carbinol</u>	<u>108-11-2</u>	<u>No</u>	<u>166.32</u>	<u>5.2</u>
<u>Methyl n-Amyl Ketone</u>	<u>110-43-0</u>	<u>No</u>	<u>376.8</u>	<u>11.75</u>
<u>Methyl Propyl Ketone</u>	<u>107-87-9</u>	<u>No</u>	<u>1120.8</u>	<u>35</u>
<u>Mica (Respirable Dust)</u>	<u>12001-26-2</u>	<u>Yes</u>	<u>4.8</u>	<u>0.15</u>
<u>Molybdenum as Mo</u>	<u>7439-98-7</u>	<u>Yes</u>	<u>7.992</u>	<u>0.25</u>
<u>Nonane</u>	<u>111-84-2</u>	<u>No</u>	<u>1680</u>	<u>52.5</u>
<u>Pentane</u>	<u>109-66-0</u>	<u>No</u>	<u>2832</u>	<u>88.5</u>
<u>Phosphoric Acid</u>	<u>7664-38-2</u>	<u>No</u>	<u>1.608</u>	<u>0.05</u>
<u>Propionic Acid</u>	<u>79-09-4</u>	<u>No</u>	<u>48</u>	<u>1.5</u>
<u>n-Propyl Acetate</u>	<u>109-60-4</u>	<u>No</u>	<u>1344</u>	<u>42</u>
<u>Propyl Alcohol</u>	<u>71-23-8</u>	<u>No</u>	<u>799.2</u>	<u>25</u>
<u>Silica - Amorphous, including:</u>	<u>61790-53-2</u>			
• <u>Diatomaceous Earth (uncalcined)</u>	<u>112926-00-8</u>	<u>Yes</u>	<u>16.008</u>	<u>0.5</u>
• <u>Precipitated Silica</u>				
• <u>Silica Gel</u>				
<u>Silica - Crystalline - Cristobalite</u>	<u>14464-46-1</u>	<u>Yes</u>	<u>0.0792</u>	<u>0.0025</u>
<u>Silica - Crystalline Quartz & Fused Silica</u>	<u>14808-60-7</u>	<u>Yes</u>	<u>0.1608</u>	<u>0.005</u>
<u>Stoddard Solvent</u>	<u>8052-41-3</u>	<u>No</u>	<u>840</u>	<u>26.25</u>
<u>Tetrahydrofuran</u>	<u>109-99-9</u>	<u>No</u>	<u>943.2</u>	<u>29.5</u>
<u>Trimethyl Benzene (Mixed and Individual Isomers)</u>	<u>25551-13-7</u>	<u>No</u>	<u>196.8</u>	<u>6.15</u>
<u>VMsP Naphtha</u>	<u>8032-32-4</u>	<u>No</u>	<u>2191.2</u>	<u>68.5</u>



Zinc	7440-66-6	Yes	16.008	0.5
Zinc Oxide Dust	1314-13-2	Yes	16.008	0.5

- a) Worst-case pounds of emissions from all coating operations (combined) per day, as calculated using procedures in this permit to estimate these emissions, or as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.
- b) Milligrams of toxic air pollutant (TAP) per cubic meter, modeling proposed emission rates calculated using a daily averaging period.

Welding Rod Usage Scenario Monitoring and Recordkeeping

Each calendar day on which welding rod materials are used, the permittee shall select and record the Daily Welding Rod Usage Scenario that will be used for that day, and comply with the maximum daily Welding Rod Usage Limits specified for the selected Scenario.

- Only one Daily Welding Rod Usage Scenario may be used each calendar day.
- The permittee shall not exceed any daily Welding Rod 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.

Welding Rod Usage Scenario Reporting

The permittee shall submit a report by May 1st on the use of a new Daily Welding Rod Usage Scenario during the previous 365-day period. The report shall include documentation supporting the TAP compliance demonstrations relied upon for each Daily Welding Rod Usage Scenario. Documentation should be in sufficient detail, including documentation of all calculations 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

4.5 Abrasive Blasting Media Usage Limits

- The daily usage of the abrasive blasting media shall not exceed 9,472 lb/day.
- The annual usage of the abrasive blasting media shall not exceed 1,231 ton per 12 calendar months rolling period.

An alternate equivalent abrasive blasting media may be used if it is demonstrated that the alternate equivalent abrasive blasting media results in emissions equal or lower than the abrasive blasting media used in this permit analysis. Refer to Appendix A of SOB for the components of the abrasive blasting media used for this permit analysis. - the permittee follows the procedures of this section. The permittee shall not use any new Abrasive Usage Scenario until abrasive TAP compliance and abrasive Emission Limit compliance have been demonstrated for that Scenario according to the procedures below.

Alternate Daily Abrasive Blasting Media Usage Scenarios

Unless using abrasive blasting media for which compliance has previously been determined (such as when new or reformulated welding rod materials are introduced), each day before abrasive blasting media is used the permittee shall follow the procedures of this section. The permittee shall not use any new Daily Abrasive Blasting Media Usage Scenario until abrasive blasting media TAP compliance and Abrasive Blasting Emission Limit compliance have been demonstrated for that Scenario according to the procedures below.

Propose a Daily Abrasive Blasting Media Usage Scenario

Prior to using or implementing a new Daily Abrasive Blasting Media Usage Scenario:



- The permittee shall propose and record maximum daily abrasive blasting media usage limits for each abrasive blasting media material that will be used in the Scenario, in pounds per day (lb/day). The permittee shall not use or implement any Scenario that does not have recorded maximum daily abrasive blasting media usage limits.
- The permittee shall estimate emissions of all TAP listed in Table 3.5 for the Scenario (lb/day for each pollutant), using the procedures described below for estimating emissions.
- The permittee shall demonstrate abrasive blasting media TAP compliance for the Scenario, using the procedures described below for demonstrating abrasive blasting media TAP compliance. The permittee shall not use or implement any Scenario that does not demonstrate abrasive blasting media TAP compliance.
- The permittee shall demonstrate abrasive blasting media Emission Limit compliance for the Scenario, using the procedures described below for demonstrating Abrasive Blasting Emission Limit compliance. The permittee shall not use or implement any Scenario that does not Abrasive Blasting Emission Limit compliance.
- The daily abrasive blasting media usage limits and emission estimates used in determining coating TAP compliance and Abrasive Blasting Emission Limit compliance shall be based on estimated emissions from all abrasive blasting media to be used from all abrasive blasting operations at the facility (i.e., facility-wide).

Estimate Abrasive Blasting TAP Emissions

TAP emissions shall be estimated for all TAP listed in Table 3.5:

- Emissions shall be estimated by multiplying each maximum daily abrasive blasting media usage rate (lb/day) by the TAP content (%) of that abrasive blasting media, and summing the total emissions from all abrasive blasting media materials (lb/day).
- TAP content (%) of abrasive blasting media is specified on the Safety Data Sheet (SDS) for that abrasive blasting media or other information provided by the manufacturer.
- For TAP content, if a range is presented on the SDS or other information for abrasive blasting media, the highest value of the range shall be used when estimating emissions, unless documented evidence from the manufacturer or supplier demonstrates otherwise.
- When the TAP content is listed as below detection on SDS or other documentation, the TAP content shall be assumed equal to the detection limit specified, unless documented evidence from the manufacturer or supplier demonstrates otherwise.

Demonstrate Abrasive Blasting Media TAP Compliance

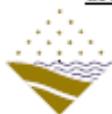
For each Daily Abrasive Blasting Media Usage Scenario, the permittee shall estimate TAP emissions and compare against the TAP Screening Emission Rates in Table 3.5:

- The permittee shall compare estimated TAP emissions for all abrasive blasting media against the Screening Emission Rates in Table 3.5. 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 Abrasive Blasting Media Usage Scenario shall not exceed the Modeled Concentration Limits in Table 3.5. 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.

Demonstrate Abrasive Blasting Emission Limit Compliance

For each Daily Abrasive Blasting Usage Scenario, emissions from all abrasive blasting operations shall be estimated and compared against the Emission Limits in the Appendix:

- For solids content, VOC content, and HAP content, if a range is presented on the SDS for abrasive blasting media, the highest value of the range shall be used when estimating emissions, unless documented evidence from the manufacturer or supplier demonstrates otherwise



- When the solids content, VOC content, or HAP content is listed as below detection on SDS or other documentation, the HAP content shall be assumed equal to the abrasive blasting density divided by 100 (i.e., 1 % of density in lb/gal) when estimating emissions, unless documented evidence from the manufacturer or supplier demonstrates otherwise
- 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 abrasive blasting media against the Abrasive Blasting Emission Limits in the Appendix. The permittee shall not use or implement any Scenario that exceeds an Abrasive Blasting Emission Limit.

Abrasive Blasting Media Usage Scenario Monitoring and Recordkeeping

Each calendar day on which abrasive blasting media materials are used, the permittee shall select and record the Daily Abrasive Blasting Media Usage Scenario that will be used for that day, and comply with the Maximum Daily Abrasive Blasting Usage Limits specified for the selected Scenario.

- Only one Daily Abrasive Blasting Usage Scenario may be used each calendar day.
- The permittee shall not exceed any Daily Abrasive Blasting 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.

Abrasive Blasting Usage Scenario Reporting

The permittee shall submit a report by May 1st on the use of a new Daily Abrasive Blasting Usage Scenario during the previous 365-day period. The report shall include documentation supporting the TAP compliance demonstrations relied upon for each Daily Abrasive Blasting Usage Scenario. Documentation should be in sufficient detail, including documentation of all calculations 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

5.3 Emission Limits

The emissions from the coating application and solvent recycling shall not exceed any corresponding emissions rate limits listed in the Appendix, or an alternate Coating Usage Scenario that is demonstrated to satisfy TAP and Painting Booth and Solvent Recycling Emission Limits.

5.7 Coating Material Formulations

Unless the permittee is complying with an Alternate Daily Coating Usage Scenario which demonstrates compliance with TAP Screening Rates and Modeled Concentration ~~Coating~~ and Emission Limits ~~and Screening Emission Rates~~, the permittee may apply the coatings listed in Table 5.2.

Table 5.2 Coating Materials

Manufacturer	Coating Material Description
PPG	Amercoat 65 Thinner



PPG	Amercoat 101 Thinner						
PPG	Amercoat 923 Thinner						
PPG	Amercoat 370 Cure (Primer)						
PPG	Amercoat 370 Pearl Gray Resin (Primer)						
PPG	Amercoat 866m Accelerator						
PPG	Amershield Cure (Topcoat)						
PPG	Composite Topcoat Finish Paint (using the maximum paint density, the maximum contents of solid, VOC, HAP and TAP of the following resins) <table border="1" style="margin-left: 40px;"> <tr> <td>Amershield Black Resin</td> </tr> <tr> <td>Amershield Deep Tint Resin</td> </tr> <tr> <td>Amershield Light Tint Resin</td> </tr> <tr> <td>Amershield Neutral Tint Resin</td> </tr> <tr> <td>Amershield Bright Red Resin</td> </tr> <tr> <td>Amershield Trinity White Resin</td> </tr> </table>	Amershield Black Resin	Amershield Deep Tint Resin	Amershield Light Tint Resin	Amershield Neutral Tint Resin	Amershield Bright Red Resin	Amershield Trinity White Resin
Amershield Black Resin							
Amershield Deep Tint Resin							
Amershield Light Tint Resin							
Amershield Neutral Tint Resin							
Amershield Bright Red Resin							
Amershield Trinity White Resin							
Axalta	Axalta Lacquer Thinner						

Alternate Daily Coating Usage Scenarios

Unless using a coating material for which compliance has previously been determined in Table 5.2 (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 procedures below.

Propose a Daily Coating Usage Scenario

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

- 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/PM2.5, VOC, and all TAP listed in Table 5.3 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).

Estimate Coating TAP Emissions

TAP emissions shall be estimated for all TAP listed in Table 3.5:



- 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 3.5 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.
- 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, unless documented evidence from the manufacturer or supplier demonstrates otherwise
- 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, unless documented evidence from the manufacturer or supplier demonstrates otherwise.
- 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.

Demonstrate Coating TAP Compliance

For each Daily Coating Usage Scenario, the permittee shall estimate TAP emissions and compare against the TAP Screening Emission Rates in Table 3.5:

- The permittee shall compare estimated TAP emissions for all coatings against the Screening Emission Rates in Table 3.5. 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 3.5. 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.

Demonstrate Coating Emission Limit Compliance

For each Daily Coating Usage Scenario, emissions from all coating operations shall be estimated and compared against the Coating Emission Limits in the Appendix:

- 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, unless documented evidence from the manufacturer or supplier demonstrates otherwise
- When the solids content, VOC content, or HAP content is listed as below detection on SDS or other documentation, the HAP content shall be assumed equal to the coating density divided by 100 (i.e., 1 % of density in lb/gal) when estimating emissions, unless documented evidence from the manufacturer or supplier demonstrates otherwise
- 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 3.5. The permittee shall not use or implement any Scenario that exceeds a Coating Emission Limit.

Coating Usage Scenario Monitoring and Recordkeeping



Each calendar day on which coating materials are 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.

Coating Usage Scenario Reporting

The permittee shall submit a report by May 1st on the use of a new Daily Coating Usage Scenario 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. Documentation should be in sufficient detail, including documentation of all calculations 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





208.345.6933 • PO Box 844, Boise, ID 83702 • www.idahoconservation.org

8/7/18

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

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

Submitted via email: tanya.chin@deq.idaho.gov and shawnee.chen@deq.idaho.gov

RE: PTC for Trinity Trailer Manufacturing, Permit No. P-2018-0005

Dear Ms. Chin and Ms. Chen:

Thank you for the opportunity to comment on the draft permit to construct (PTC) for Trinity Trailer in Boise, ID.

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 30,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality and public health.

Our detailed comments are provided following this letter. Please do not hesitate to contact me at 208-345-6933 ext. 23 or ahopkins@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,

A handwritten signature in black ink that reads "Austin Hopkins".

Austin Hopkins
Conservation Associate

*RE: Idaho Conservation League comments on PTC for Trinity Trailer Manufacturing,
Permit No. P-2018-0005*

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TAP Emissions

Table 6 in the Statement of Basis provides a summary of potential to emit (PTE) for emission increases of toxic air pollutants (TAPs). It appears that DEQ is reporting pre-project and post-project values as “controlled hourly emissions.” We question the appropriateness of the reported values given that a number of emission sources lack any emission control equipment. Thus, it seems inappropriate to utilize “controlled hourly emissions” values if the sources of the emissions are not in fact controlled in any manner. We encourage DEQ to recalculate pre- and post-project PTE for TAPs using an appropriate emission factor.

Regulation of HAPs

According to DEQ’s Statement of Basis, the hazardous air pollutants (HAPs) emitted from the paint booth and solvent recycling operation are regulated by 40 CFR 63 Subpart HHHHHH. DEQ presumes that EPA evaluated the potential emission of 187 HAPs from operations such as this one that fall under the regulations of 40 CFR 63. DEQ cites this as justification for not conducting a further review related to HAPs. However, we are confused by this statement, because immediately following this statement in the Statement of Basis is Table 7, which summarizes the potential to emit (PTE) values for HAPs from all emission units.

We ask DEQ to clarify if Table 7 reflects HAPs PTE from all emission sources at the facility, or only those that are not regulated under 40 CFR 63 Subpart HHHHHH. Further, we are curious if DEQ reached out to the EPA to validate their presumption that the 187 HAPs were considered as part of 40 CFR 63, and request that they please provide a summary of the correspondence between DEQ and EPA regarding this facility’s permit.

Low VOC Paint

The paint booth is the most substantial emitter of VOCs from this facility (50.4 T/yr PTE). We are curious if DEQ or the applicant has evaluated or plan to use low-VOC paint. If utilized, low-VOC paint could significantly reduce the emissions of VOCs from the paint booth. If this option was analyzed, we request that DEQ provide details regarding the emissions reductions that would result from utilizing low-VOC as well as the reasoning behind why this was not selected as an emission control device in the draft permit. If this option was not analyzed, we request details as to why that was the case.

Emission Venting Indoors

A number of the emission sources vent back indoors where we presume there will be employees working. If this is the case, we are curious if DEQ has consulted with the Occupational Safety and Health Administration (OSHA) to discuss indoor air quality

RE: Idaho Conservation League comments on PTC for Trinity Trailer Manufacturing, Permit No. P-2018-0005

Page 2 of 3

resulting from the venting of these emission sources. We request that DEQ explain the extent of their consideration for indoor air quality while drafting this permit, and include copies of or references to any supporting material relied upon to demonstrate that indoor air quality will be protective of employee health.

*RE: Idaho Conservation League comments on PTC for Trinity Trailer Manufacturing,
Permit No. P-2018-0005*

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