

Statement of Basis

Tier I Operating Permit No. T1-2012.0067

Project ID 61131

Best Bath Systems, Inc.

Caldwell, Idaho

Facility ID 027-00103

Draft for Facility Review

DRAFT XX, 2013

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Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

1.	ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
2.	INTRODUCTION AND APPLICABILITY.....	4
3.	FACILITY INFORMATION	5
4.	APPLICATION SCOPE AND APPLICATION CHRONOLOGY	8
5.	EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY	9
6.	EMISSIONS LIMITS AND MRRR.....	11
7.	REGULATORY REVIEW	21
8.	PUBLIC COMMENT	30
9.	EPA REVIEW OF PROPOSED PERMIT	30

APPENDIX A - EMISSIONS INVENTORY

APPENDIX B - FACILITY COMMENTS FOR DRAFT PERMIT

1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O ₂	oxygen
PC	permit condition
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T1	Tier I operating permit
T2	Tier II operating permit
TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compound

2. INTRODUCTION AND APPLICABILITY

Best Bath Systems, Inc. (BBS) is a manufacturer of fiberglass tubs and showers, and is located at 723 Garber Street, Caldwell, Idaho 83605. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit volatile organic compound (VOC) above the major source threshold of 100 tons-per-year. The facility is also classified as a major facility, as defined by Subsection 008.10.a, because it emits or has the potential to emit styrene above the major source thresholds of 10 tons-per-year for any single HAP and/or 25 tons-per-year for any combination of HAP.

As a major facility, Best Bath Systems, Inc. is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from Best Bath Systems, Inc. as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for Best Bath Systems, Inc..

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

Best Bath Systems, Inc. Tier I operating permit is organized into sections. They are as follows:

Section 2 - Tier I Operating Permit Scope

The scope describes this permitting action.

Section 3 - Facility-Wide Conditions

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

Sections 4 – Production of Bath Units (Stacks EF-9, EF-10, EF-11, EF-12, and EF-14)

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

Section 5 - Non-applicable Requirements and Insignificant Activities

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

Section 6 - General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

3. FACILITY INFORMATION

3.1 Facility Description

Best Bath Systems, Inc. (BBS) is a fiberglass tub and shower manufacturer. The facility has seven General Emission Units, two make-up air units, and one spray booth associated with this Tier I application. Presented below is a copy of the description of the emission units as presented in the Tier I application.

EU7 – Resin Storage Room

Fiberglass resin is stored in two 5500 gallon capacity tanks in the Resin Storage Room, emission point EU7, located in the southwest corner of the building. The tanks sit inside secondary containment. The room is equipped with a roof-mounted ventilation fan. This centrifugal, up-blast exhaust fan, stack EF7, discharges vertically. The resin tanks are refilled via a supply truck. The resin is composed of styrene and unsaturated polyester polymer in a 35/65 wt% mix. Maximum daily styrene emissions from the room will occur when the tanks are refilled and styrene-saturated air is displaced from the tanks. There is no emission control equipment installed on the exhaust of the Resin Storage Room.

EU8 – Maintenance Room

The Maintenance Shop is used for miscellaneous equipment fabrication and repair. Maintenance Shop activities periodically require incidental welding. The exhaust fan in the Maintenance Shop is used to exhaust welding fumes but is primarily used to provide air flow for worker comfort. Makeup air to the Maintenance Shop is drawn in from outside, not from the production area. The maintenance shop pollutant emissions are assumed to be insignificant in comparison to the other facility emissions and are not included in the analysis.

EU9 – Lamination Area

BBS produces fiberglass shower and tub units primarily using spray layup techniques on open molds. Typically, three polyester-styrene layers are applied to molds to create the units: gel coat, barrier coat, and glass-reinforced resin. A fourth polymeric diisocyanate material, “blue foam,” is sprayed on to create reinforced floors. The first three layers are applied in the Lamination Area.

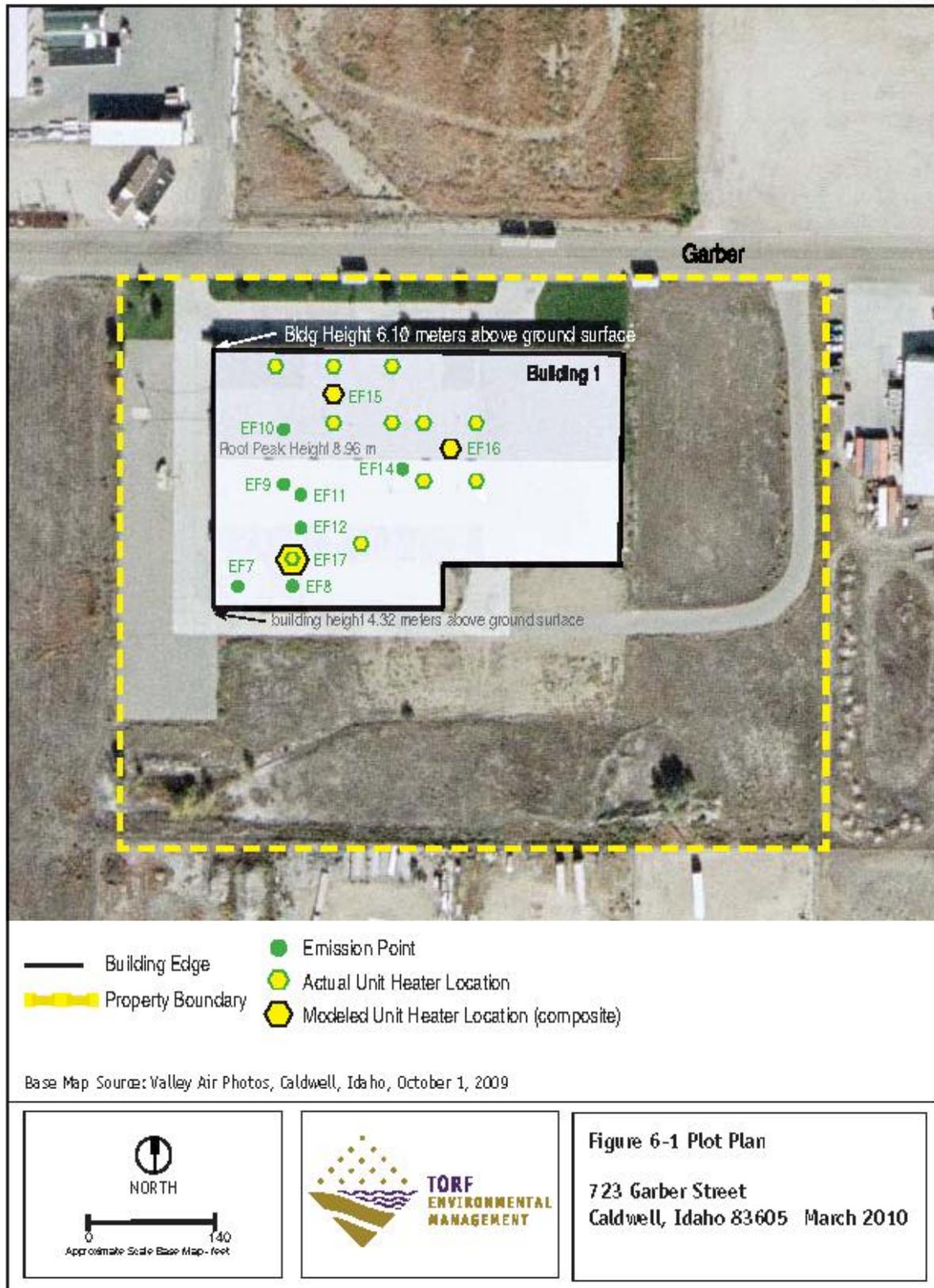
Process Description

BBS employs an “open-plan” production floor in the Lamination Area. The open-plan system improves efficiencies as the units are moved through the production cycle. Molds on wheeled carts are brought into the Lamination Area from Mold Storage. The first material, gel coat, is applied to the molds using atomizing, manual spray guns. The molds are then moved east to the next station where a second layer, barrier coat, is applied using atomizing, manual spray guns. The molds are then moved clockwise through two more stations where two layers of resin and chopped glass strand are applied using non-atomizing, manual spray guns. The surface is “rolled” to remove any trapped air. The resin is given time to cure, after which the units are removed from the molds before being moved into the next production area.

Additional Equipment

The open plan floor eliminates the traditional spray booths for the different sprayed layers. Instead, air exhaust and emission control are handled differently. Two long, cylindrical horizontal ducts are suspended above the production floor along the north and south Room 2 walls. Fourteen intakes (seven per duct) are spaced along the horizontal ducts. These intakes are 50” by 12” rectangular ducts that descend to the shop floor. Approximately 1 foot above the floor, each intake has a 24” by 24” opening fitted with particulate control filters. Emissions from the Lamination Area stations are drawn via two exhaust fans into and up the intakes, through the horizontal ducts, and discharged outside, vertically, above the roof from stacks EF9 and EF10.

Fresh air to the Lamination Area is provided by a direct-fired, natural gas Make Up Air Unit, MAU1. The Lamination Area is designed to operate under negative pressure. The atomizing spray gun used for the gel



and barrier coat application is a Magnum Venus ATG-3500 gel gun. The non-atomizing spray gun used for the resin application is a Magnum Venus TRT-1000-F.

The fourteen exhaust 24" x 24" exhaust air filter units, EC9A to EC9G and EC10A to EC10G, are equipped with two Purolator fiberglass panel filters installed in series: FACET-Aire F312 with an average arrestance of 72 wt% and Purolator Bulk Media with an average arrestance of 84 wt%. Test data for the F312 filter and manufacturer's specification sheets for both filters was provided in the application. Test data to support the manufacturer's spec sheet were not available for the bulk media. The calculated overall arrestance of the two filters in series is:

$$\text{Overall Arrestance, \%} = 100\% - 100\% * (1 - 0.72) * (1 - 0.84) = 95.5 \text{ wt\%}$$

However, because of the lack of test data documentation for the bulk media, for this permit analysis 90% filter efficiency was used.

EU11 – Trim/Finish Area

The Trim/Finish Area includes finishing raw edges, installing plumbing holes, spraying reinforced flooring and touching-up small flaws on the tub and shower units.

At the Blue Bottom Area rigid floor foam is manually sprayed under the base of some units. At the Finish Area, inspection and any required touch-up work occur. Assembly/Packaging includes attaching fixtures and crating for shipment.

Equipment

Fresh air for the Trim/Finish Area is provided by a direct-fired, natural gas Make Up Air Unit, MAU2. Emissions from the Blue Bottom Area stations are drawn via two exhaust fans, EF11 and EF12, located on the roof directly above the Blue Bottom Area. Intake plenums equipped with particulate filters, EC11 and EC12, descend to the shop floor adjacent to the Blue Bottom spray area.

The Trim Room corridors (approximately 15 feet tall) are also equipped with particulate emission control equipment, ECT1 and ECT2. Trim Room fans, RF1 and RF2, draw air from the trimming area through particulate filters. The Trim Room fans discharge the filtered air back into the Trim/Finish Area, not to the outside.

All of the particulate filters used are equivalent or more efficient than Purolator FACET-Aire F312 and Purolator Bulk Media used in emission calculations. Currently, particulate filters at the Trim Room corridors are American Air Filter and Durashield Cartridge Filter. The manufacturer indicates a minimum efficiency value of greater than or equal to 90%.

Since the Trim Room fans discharge back into the Trim/Finish Area, particulate not captured by the Trim Room filters could be discharged outside via exhaust fans EF11 or EF12. To estimate the facility particulate emissions from the Trim Room operations, 80% capture and control efficiency was estimated for the Trim Rooms circulating air treatment system.

EU15/EU16/EU17 – Unit Heaters

There are eleven gas-fired unit heaters installed throughout the facility. These units typically have an input design duty of 300,000 Btu/hr. The combustion gases from these units are vented via 8" ducts directly up through the roof. Because the potential emissions from each of these small units is not large, and because they are clustered together in certain rooms around the facility, groups of heaters are collocated into three composite point sources for emission estimating. EU15 is a composite of five unit heaters located in the Mold Maintenance Area (Room 1). EU16 is a composite of four unit heaters located in the Assembly/Packaging Area (Room 4). EU17 is a composite of two unit heaters located in and just outside the Maintenance Room.

MAU – Make Up Air Unit 1

Fresh air to the Lamination Area is provided by a make up air unit, MAU1, located just outside the west wall of the building. For cold weather operations, MAU1 includes a direct-fired, natural gas fueled air

heater with a design input duty of 8.565 MMBtu/hr. A Hastings Model SBD 233 make up air unit has been specified for this service. The unit is direct-fired and the combustion gas are emitted via the Lamination Area exhaust fans, EF9 and EF10.

MAU2 – Make Up Air Unit 2

Fresh air to the Trim/Finish Area is provided by a make up air unit, MAU2, located just outside the west wall of the building. For cold weather operations, MAU2 includes a direct-fired, natural gas fueled air heater with a design input duty of 1.00 MMBtu/hr. A Hastings Model SBD 215 make up air unit has been specified for this service. The unit is direct-fired and the combustion gas will be emitted via the Blue Bottom Area exhaust fans, EF11 and EF12.

Spray Paint Booth

The Accent Booth is located in the Assembly/Packaging Area and is used to apply trim color to certain tub and shower units. Automotive paint is applied with a manual spray gun. Accent painting is not done on every tub and shower unit. Therefore the paint booth typically operates 2-3 days per week.

The booth is equipped with an exhaust fan, EF14, which draws booth air through overspray filters and discharges through a roof stack. BBS will install overspray air filters and pre-filters with a minimum combined capture efficiency of 90%. The Accent Booth exhaust fan is a Greenheck Model TAB-30-030T3, operating at 12,600 CFM.

Wet coatings are applied using a Sata Jet gravity-feed manual spray gun. The EPA reports typical transfer efficiency of 25% for wet coating spray application. All wet coating particulate emissions are conservatively assumed to be PM₁₀. All volatile wet coating components are assumed to be completely emitted.

3.2 Facility Permitting History

Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

June 22, 2010 P- 2010.0047, Initial permit to construct (PTC), Permit status (A)

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

4.1 Application Scope

This permit is the initial Tier I operating permit for this facility.

4.2 Application Chronology

November 2, 2012	DEQ received an application.
December 28, 2012	DEQ determined that the application was complete.
January 9, 2013	DEQ made available the draft permit and statement of basis for peer and regional office review.
January 16, 2013	DEQ made available the draft permit and statement of basis for applicant review.
Month Day – Month Day, Year	DEQ provided a public comment period on the proposed action.
Month Day, Year	<i>{For projects with public hearings}</i> DEQ provided a public hearing in CITY.
Month Day, Year	DEQ provided the proposed permit and statement of basis for EPA review.

5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

5.1 Process No. 1 – Production of Bath Units

Table 5.1 lists the emissions units and control devices associated with the production of bath units.

Table 5.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Coatings applications during fabrication of fiberglass reinforced plastics	For PM/PM ₁₀ /PM _{2.5} control: 1-inch fiberglass filter (approximately 72% efficiency); and fiberglass bulk media filter (approximately 84% efficiency) For VOC and HAP control: Control of operations in accordance with NESHAP/MACT requirements	EF-9, EF-10, EF-11, and EF-12
Accent application in a paint booth		EF-14
Trim and finish operations. Rough edges are trimmed and plumbing holes are drilled. Exhaust from this area is filtered and exhausted back into the Trim Room work area. It is not directly vented to the outside.	For PM/PM ₁₀ /PM _{2.5} control: High-efficiency cartridge filters with a minimum efficiency of 90%.	---
Combustion emissions from a makeup air unit with an input rating of approximately 8.6 MMBtu/hr. Emissions from this direct-fired natural gas fueled unit are vented thru the fiberglass production area exhaust stacks.	Use of natural gas fuel, and good combustion control	EF-9, EF-10, EF-11, and EF-12

Best Bath Systems produces fiberglass shower and tub units primarily using spray layup techniques on open molds. Typically, three polyester-styrene layers are applied to molds to create the units: gel coat, barrier coat, and glass-reinforced resin. A fourth polymeric diisocyanate material, “blue foam,” is sprayed on to create reinforced floors. The first three layers are applied in the Lamination Area. Accents may be applied in a paint booth (EF-14).

The air ventilation system for production operations exhausts through a series of two filters to stacks as listed below. The exhaust from the air ventilation system first passes through a fiberglass bulk media filter and then through a 1-inch fiberglass filter. Emissions from the makeup air units are co-mingled with the production area emissions, and exit the building through the production area stacks.

5.2 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 5.2 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

Table 5.2 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit / Activity	Regulatory Authority / Justification
11 natural gas-fired unit heaters less than 5,000,000 Btu/hr	58.01.01.317(b)(5)
Make up air unit #2 less than 5,000,000 Btu/hr fired on natural gas	58.01.01.317(b)(5)

5.3 Non-applicable Requirements for Which a Permit Shield is Requested

This section of the permit lists the regulations for which the facility has requested, and DEQ proposes to grant, a permit shield pursuant to IDAPA 58.01.01.325. The findings on which this shield is based are presented below:

- Requirements for Which a Permit Shield Will Be Granted

IDAPA 58.01.01.675-681 – Fuel Burning Equipment – Particulate Matter

This regulation is not an applicable requirement for the facility. The natural gas-fired makeup air and unit heaters at the facility are direct heat transfer units.

IDAPA 58.01.01.700-701 – Particulate Matter Process Weight Limitations

This regulation establishes process weight limitation for emissions. The particulate matter at the facility is contributed by gel coats, barrier coat, resin and paints used. Because the maximum 24-hour averaged particulate rate satisfies the regulation, the requirement is not applicable.

40 CFR 60 Subpart Kb – NSPS Standards for Volatile Organic Liquid Storage

This regulation is not applicable to the facility. The combined capacity of the resin storage tanks is less than the 19,800 gallon threshold for applicability.

40 CFR 63 Subpart HHHHHH – NESHAP for Paint Stripping and Misc. Surface Coating

This regulation is not applicable to the facility. The paint coatings applied at the facility do not contain the target HAPs of chromium, lead, manganese, nickel, or cadmium.

- Requirements for Which a Permit Shield Will Not Be Granted

40 CFR 98 – Mandatory Greenhouse Gas Reporting Rule

This regulation is not an applicable requirement for Tier I permitting purposes therefore a determination of non-applicability for Tier I purposes and a permit shield is not needed. The rule applies on its own merits regardless of whether it is a Tier I applicable requirement or not.

5.4 Emissions Inventory

Table 5.3 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. 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 hour 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 emission is state or federally enforceable.

Listed below Table 5.3 are the references for the emission factors used to estimate the emissions. The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix A of this statement of basis.

Table 5.3 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)

Source Description	PM ₁₀ T/yr	NO _x T/yr	SO ₂ T/yr	CO T/yr	VOC T/yr	Lead T/yr	HAP T/yr	GHG CO ₂ e T/yr
Lamination Area South, MAU1 – EF9	2.05	0.00	0.00	0.00	0.00	0.00	100.1	
Lamination Area North, MAU1 – EF10	2.05	0.00	0.00	0.00	0.00	0.00		
Blue Bottom Area North, MAU2 – EF11	0.38	0.00	0.00	0.00	0.00	0.00		
Blue Bottom Area South, MAU2 – EF12	0.38	0.00	0.00	0.00	0.00	0.00		
Accent Booth – EF14	0.22	0.00	0.00	0.00	0.00	0.00	0.18	
All VOC Sources	0.00	0.00	0.00	0.00	108 ^a	0.00		
All Natural Gas Combustion Sources	0.42	5.52	0.033	4.64	0.30	0.00	0.11	6694
Total Emissions	5.50	5.52	0.033	4.64	108.30	0.00	100.39	6694

a) For detail of VOC emissions refer to Appendix A.

6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Production of Bath Units Emissions Limits;
- Tier I Operating Permit General Provisions.

MRRR

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling. In addition to the specific MRRR described under each permit condition, generally applicable facility-wide conditions and general provisions may also be required, such as monitoring, recordkeeping, performance testing, reporting, and certification requirements.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, a description of why and how the condition was changed is provided.

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

6.1 Facility-Wide Conditions

Permit Condition 3.1 - Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/07]

MRRR (Permit Conditions 3.2 through 3.4)

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct facility-wide inspections of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

Permit Condition 3.5 - Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

MRRR (Permit Condition 3.6)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State only), 5/1/94]

Permit Condition 3.7 - Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

MRRR (Permit Condition 3.8 through 3.9)

- Conduct facility-wide inspections of all emissions units subject to the visible emissions standards (or rely on continuous opacity monitoring);

- If visible emissions are observed, take appropriate corrective action and/or perform a Method 9 opacity test;
- Maintain records of the results of each visible emissions inspection.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Permit Conditions 3.10 through 3.14 - Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the excess emissions facility wide conditions and the regulations of IDAPA 58.01.01.130-136.

MRRR (Permit Conditions 3.10 through 3.14)

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory;
- Notify DEQ of each excess emissions events as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ;
- Maintain records of each excess emissions event.

Permit Condition 3.15 - Open Burning

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 5/08/09]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.16 - Asbestos

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.17 - Accidental Release Prevention

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.18 - Recycling and Emissions Reductions

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.19 - NESHAP General Provisions

This facility is subject to NESHAP Subpart WWWW, and is therefore required to comply with applicable General Provisions.

[40 CFR 60, Subpart A]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.20 - Monitoring and Recordkeeping

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

[IDAPA 58.01.01.322.06, 07, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Conditions 3.21 through 3.24 - Performance Testing

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

MRRR (Permit Conditions 3.23 and 3.24)

The permittee shall submit compliance test report(s) to DEQ following testing.

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Permit Condition 3.25 - Reports and Certifications

This permit condition establishes generally applicable MRRR for submittal of reports, certifications, and notifications to DEQ and/or EPA as specified.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.26 - Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein.

[IDAPA 58.01.01.107, 4/7/11]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

6.2 Emissions Unit-Specific Emissions Limits and MRR

Production of Bath Units (Stacks EF-9, EF-10, EF-11, EF-12, and EF-14)

Permit Condition 17 in P-2010.0047 PROJ 0047 was not incorporated into the Tier I operating permit because this condition has been satisfied with the performance tests performed on 9/12/2012. Permit Condition 20 in P-2010.0047 PROJ 0047 was not incorporated into the Tier I operating permit because this condition was previously satisfied. In addition, Permit Condition 21 in P-2010.0047 PROJ 0047 was not incorporated into the Tier I operating permit because this condition was satisfied with the submittal of the Tier I application.

Permit Condition 4.1, Emission Limits

Total emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) from Stacks EF-9, EF-10, EF-11, and EF-12 shall not exceed any corresponding emission limit listed in Table 4.3. Total emissions of volatile organic compounds (VOCs) from Stacks EF-9, EF-10, EF-11, and EF-12 shall not exceed any corresponding emission limit listed in Table 4.3. Three years from the date of notification of exceedance of the HAP emission threshold specified in 40 CFR 63.5805(c), the total VOC emission limit specified in Table 4.3 of this permit shall not apply, and the permittee shall comply with the emission limits specified in Permit Condition 4.3.

Table Error! Reference source not found..3. Lamination area and blue bottom area emission limits^a.

Pollutant	Lb/hr ^c	T/yr ^d
PM ₁₀ ^b	1.60	
Total VOCs		108

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.81.
- c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.
- d) Tons per any consecutive 12-calendar month period.

MRRR - (Permit Conditions 4.10, 4.11 through 4.13)

This facility is required to comply with the emissions standards for PM₁₀ and VOCs. The PM₁₀ emission limit is demonstrated through compliance with the spray gun and filter specifications and the dust collection system. Compliance has already been demonstrated with a performance test. The VOC emission limit is demonstrated through the material usage records and the VOC emissions determination equation.

Permit Conditions 4.2 – 4.4, MACT Limitations, Work Practice Standards, and Compliance Deadlines

Permit Conditions 4.2 through 4.4 of the permit incorporate the requirements of 40 CFR 63 Subpart WWWW. Should there be a conflict between Subpart WWWW and the permit, Subpart WWWW shall govern including any amendments to the regulation.

MRRR - (Permit Conditions 4.10 and 4.17 – 4.28)

Monitoring, recordkeeping, testing, and reporting requirements necessary to demonstrate compliance with the MACT limitations, work practice standards, and compliance dates are specified by the MACT requirements in Permit Conditions 4.10 and 4.17 through 4.28.

Permit Condition 4.5, Opacity Limit

Emissions from Stacks EF-9, EF-10, EF-11, EF-12, and EF-14, or any other stack, vent, or functionally equivalent opening associated with the coating application process, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

MRRR - (Permit Conditions 3.8 through 3.9 and 4.15)

The facility is required to comply with the state opacity standard. The facility is required to report each instance where the requirements are not met.

Permit Condition 4.6, Reasonable Control of Fugitive Dust Emissions

In accordance with IDAPA 58.01.01.651, all reasonable precautions shall be taken to prevent PM from becoming airborne. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

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

dusts.

- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

MRRR - (Permit Conditions 3.2 through 3.4 and 4.16)

The facility is required to comply with all fugitive dust requirements including reasonably controlling PM that may become airborne. The facility is required to report each instance where the requirements are not met.

Permit Condition 4.7, Odorous Emissions

Odorous gases shall not be emitted to the atmosphere in such quantities as to cause air pollution, as required by IDAPA 58.01.01.775.

MRRR - (Permit Conditions 3.5 through 3.6 and 4.14)

The facility is required to comply with all odor requirements and to minimize odorous gases that may be emitted. The facility is required to report each instance where the requirements are not met.

Permit Condition 4.8, Use of Natural Gas in Fuel-burning Equipment

The permittee shall burn natural gas exclusively in the fuel-burning equipment at this facility.

MRRR

No MRRR has been required in the permit for this permit condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

6.3 General Provisions

Unless expressly stated, there are no MRRR for the general provisions.

General Compliance, Duty to Comply

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

General Compliance, Need to Halt or Reduce Activity Not a Defense

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

General Compliance, Duty to Supplement or Correct Application

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening, Additional Requirements, Material Mistakes, Etc.

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

Reopening, Permitting Actions

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98; Idaho Code §39-108; 40 CFR 70.6(b)(1), (2)]

Inspection and Entry

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

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

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

New Applicable Requirements

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

Certification

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.

- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
 - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;
 IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;
 IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00;
 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as specified.

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified;
- All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended,
 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

False Statements

The permittee may not make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

The permittee may not render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months as specified.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required, Emissions Trading

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

In accordance with IDAPA 58.01.01.332, an “emergency” as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

7. REGULATORY REVIEW

7.1 Attainment Designation (40 CFR 81.313)

The facility is located in Canyon County which is designated as attainment or unclassifiable for PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone. Reference 40 CFR 81.313.

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

The facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for VOC and 10 tons per year for any one HAP (i.e., styrene) as demonstrated previously in the Emissions Inventory Section of this analysis. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10, and is subject to Tier I permitting requirements.

7.3 PSD Classification (40 CFR 52.21)

The facility is not a major facility for the purposes of the federal prevention of significant deterioration (PSD) program as referenced by IDAPA 58.01.01.205 because the facility does not emit or has the potential to emit a regulated criteria air pollutant in amounts greater than or equal to the major threshold criteria of 250 T/yr. Greenhouse gases (GHG) are not subject to regulation at this facility because the

facility does not emit or have the potential to emit GHG in amounts greater than or equal to the major threshold criteria of 100,000 T/yr CO₂e.

7.4 NSPS Applicability (40 CFR 60)

The facility is not subject to any New Source Performance Standards (NSPS) in 40 CFR 60.

7.5 NESHAP Applicability (40 CFR 61)

The facility is not subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR 61.

7.6 MACT Applicability (40 CFR 63)

The facility is subject to the requirements of 40 CFR 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. Refer to PTC No. P-2010.0047 PROJ 0047, issued June 22, 2010 for the complete MACT applicability breakdown for the facility.

The permittee has requested high level citation of the MACT in the operating permit. Listed below is an expansion of certain MACT permit conditions for both the facility and DEQ’s reference.

Permit Condition 4.3 – MACT Emission Limitations

Summary of Table 3 to 40 CFR Part 63, Subpart WWWW

If your operation type is . . .	And you use . . .	Your organic HAP emissions limit is . . .
open molding - corrosion-resistant and/or high strength (CR/HS)	a. mechanical resin application b. filament application c. manual resin application	113 lb/ton. 171 lb/ton. 123 lb/ton.
open molding – non-CR/HS	a. mechanical resin application b. filament application c. manual resin application	88 lb/ton. 188 lb/ton. 87 lb/ton.
open molding - tooling	a. mechanical resin application b. manual resin application	254 lb/ton. 157 lb/ton.
open molding - low-flame spread/low-smoke products	a. mechanical resin application b. filament application c. manual resin application	497 lb/ton. 270 lb/ton. 238 lb/ton.
open molding - shrinkage controlled resins	a. mechanical resin application b. filament application c. manual resin application	354 lb/ton. 215 lb/ton. 180 lb/ton.
open molding - gel coat	a. tooling gel coating b. white/off white pigmented gel coating c. all other pigmented gel coating d. CR/HS or high performance gel coat e. fire retardant gel coat f. clear production gel coat	440 lb/ton. 267 lb/ton. 377 lb/ton. 605 lb/ton. 854 lb/ton. 522 lb/ton.

Permit Condition 4.4 – MACT Work Practice Standards

Summary of Table 4 to 40 CFR Part 63, Subpart WWWW

For ...	You must ...
a new or existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin.
a new or existing materials HAP-containing materials storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.
all mixing or bulk molding compound (BMC) manufacturing operations ¹	use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation..
all mixing or BMC manufacturing operations ¹	close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety. Vents routed to a 95 percent efficient control device are exempt from this requirement.
all mixing or BMC manufacturing operations ¹	keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

¹Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin). For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

Permit Condition 4.10 – MACT Compliance Demonstration Requirements

Below is a breakdown of 40 CFR 63.5810.

- a) In accordance with 40 CFR 63.5810, the permittee must use one of the following methods (a) through (d) for open molding to meet the applicable standards of Table 3 of this subpart.
 - 1) Calculate your actual organic HAP emissions factor for each different process stream within each operation type. A process stream is defined as each individual combination of resin or gel coat, and application technique. Process streams within operations types are considered different from each other if any of the following four characteristics vary: the neat resin plus or neat gel coat plus organic HAP content, the gel coat type, the application technique, or the control technique. You must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding.
 - 2) If the calculated emission factor is less than or equal to the appropriate emission limit, you have demonstrated that this process stream complies with the emission limit in Table 3 to this subpart. It is not necessary that all your process streams, considered individually, demonstrate compliance to use this option for some process streams. However, for any individual resin or gel coat you use, if any of the process streams that include that resin or gel coat are to be used in any averaging calculations described in paragraphs (b) through (d) of this section, then all process streams using that individual resin or gel coat must be included in the averaging calculations.
- b) In accordance with 40 CFR 63.810(b), demonstrate that, on average, the individual HAP limits for each combination of operation type and resin application method or gel coat type is met.

1) (i) Group the process streams described in paragraph (a) to this section by operation type and resin application method or gel coat type listed in Table 3 to this subpart and then calculate a weighted average emission factor based on the amounts of each individual resin or gel coat used for the last 12 months. To do this, sum the product of each individual organic HAP emissions factor calculated in paragraph (a)(1) of this section and the amount of neat resin plus and neat gel coat plus usage that corresponds to the individual factors and divide the numerator by the total amount of neat resin plus and neat gel coat plus used in that operation type as shown in Equation 2 of this section.

$$\text{Average organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Process Stream } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 2})$$

Where:

Actual Process Stream EF_i = actual organic HAP emissions factor for process stream i , lbs/ton;

Material i = neat resin plus or neat gel coat plus used during the last 12 calendar months for process stream i , tons;

n = number of process streams where you calculated an organic HAP emissions factor.

(ii) You may, but are not required to, include process streams where you have demonstrated compliance as described in paragraph (a) of this section, subject to the limitations described in paragraph (a)(2) of this section, and you are not required to and should not include process streams for which you will demonstrate compliance using the procedures in paragraph (d) of this section.

2) Compare each organic HAP emissions factor calculated in paragraph (b)(1) of this section with its corresponding organic HAP emissions limit in Table 3 to this subpart. If all emissions factors are equal to or less than their corresponding emission limits, then you are in compliance.

c) In accordance with 40 CFR 63.810(c), demonstrate compliance with a weighted average emission limit. Demonstrate each month that you meet each weighted average of the organic HAP emissions limits in Table 3 subpart that apply to you. When using this option, you must demonstrate compliance with the weighted average organic HAP emissions limit for all your open molding operations.

1) Each month calculate the weighted average organic HAP emissions limit for all open molding operations for your facility for the last 12-month period to determine the organic HAP emissions limit you must meet. To do this, multiply the individual organic HAP emissions limits in Table to this subpart for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type, sum these results, and then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding the last 12 months as shown in Equation 3 of this section.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 3})$$

Where:

EL_i =organic HAP emissions limit for operation type i, lbs/ton from Tables 3 or 5 to this subpart;

$Material_i$ =neat resin plus or neat gel coat plus used during the last 12-month period for operation type i, tons;

n=number of operations.

- 2) Each month calculate your weighted average organic HAP emissions factor for open molding. To do this, multiply your actual open molding operation organic HAP emissions factors calculated in paragraph (b)(1) of this section and the amount of neat resin plus and neat gel coat plus used in each open molding operation type, sum the results, and divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding operations as shown in Equation 4 of this section.

$$\begin{array}{l} \text{Actual Weighted} \\ \text{Average organic} \\ \text{HAP Emissions} \\ \text{Factor} \end{array} = \frac{\sum_{i=1}^n (\text{Actual Operation } EF_i * \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i} \quad (\text{Eq. 4})$$

Where:

Actual Individual EF_i =Actual organic HAP emissions factor for operation type i, lbs/ton;

$Material_i$ =neat resin plus or neat gel coat plus used during the last 12 calendar months for operation type i, tons;

n=number of operations.

- 3) Compare the values calculated in paragraphs (c)(1) and (2) of this section. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.
- d) In accordance with 40 CFR 63.810(d), meet the organic HAP emissions limit for one application method and use the same resin(s) for all application methods of that resin type. This option is limited to resins of the same type. The resin types for which this option may be used are noncorrosion-resistant, corrosion-resistant and/or high strength, and tooling.
 - (1) For any combination of manual resin application, mechanical resin application, filament application you may elect to meet the organic HAP emissions limit for any one of these application methods and use the same resin in all of the resin application methods listed in this paragraph (d)(1). Table 7 to this subpart presents the possible combinations based on a facility selecting the application process that results in the highest allowable organic HAP content resin. If the resin organic HAP content is below the applicable value shown in Table 7 to this subpart, the resin is in compliance.

Summary of Table 7 to 40 CFR Part 63, Subpart WWWW

If your facility has the following resin type and application method . . .	The highest resin weight is* * * percent organic HAP content, or weighted average weight percent organic HAP content, you can use for . . .	is . . .
1. Corrosion resistant/high strength (CR/HS) resins, centrifugal casting ^{1,2}	a. CR/HS mechanical	³ 48.0
	b. CR/HS filament application	48.0
	c. CR/HS manual	48.0
2. CR/HS resins, nonatomized mechanical	a. CR/HS filament application	46.4
	b. CR/HS manual	46.4
3. CR/HS resins, filament application	CR/HS manual	42.0
4. non-CR/HS resins, filament application	a. non-CR/HS mechanical	³ 45.0
	b. non-CR/HS manual	45.0
	c. non-CR/HS centrifugal casting ^{1,2}	45.0
5. non-CR/HS resins, nonatomized mechanical	a. non-CR/HS manual	38.5
	b. non-CR/HS centrifugal casting ^{1,2}	38.5
6. non-CR/HS resins, centrifugal casting ^{1,2}	non-CR/HS manual	37.5
7. tooling resins, nonatomized mechanical	tooling manual	
8. tooling resins, manual	tooling atomized mechanical	45.9

¹If the centrifugal casting operation blows heated air through the molds, then 95 percent capture and control must be used if the facility wishes to use this compliance option.

²If the centrifugal casting molds are not vented, the facility may treat the centrifugal casting operations as if they were vented if they wish to use this compliance option.

³Nonatomized mechanical application must be used.

- (2) You may also use a weighted average organic HAP content for each application method described in paragraph (d)(1) of this section. Calculate the weighted average organic HAP content monthly. Use Equation 2 in paragraph (b)(1) of this section except substitute organic HAP content for organic HAP emissions factor. You are in compliance if the weighted average organic HAP content based on the last 12 months of resin use is less than or equal to the applicable organic HAP contents in Table 7 to this subpart.
- (3) You may simultaneously use the averaging provisions in paragraph (b) or (c) of this section to demonstrate compliance for any operations and/or resins you do not include in your compliance demonstrations in paragraphs (d)(1) and (2) of this section. However, any resins for which you claim compliance under the option in paragraphs (d)(1) and (2) of this section may not be included in any of the averaging calculations described in paragraph (b) or (c) of this section.
- (4) You do not have to keep records of resin use for any of the individual resins where you demonstrate compliance under the option in paragraph (d)(1) of this section unless you elect to include that resin in the averaging calculations described in paragraph (d)(2) of this section.

Summary of Table 8 to 40 CFR Part 63, Subpart WWWW

For . . .	That must meet the following organic HAP emissions limit . . .	You have demonstrated initial compliance if . . .
open molding and centrifugal casting operations	a. an organic HAP emissions limit shown in Tables 3 or 5 to this subpart, or an organic HAP content limit shown in Table 7 to this subpart	i. you have met the appropriate organic HAP emissions limits for these operations as calculated using the procedures in § 63.5810 on a 12-month rolling average 1 year after the appropriate compliance date, and/or ii. you demonstrate that any individual resins or gel coats not included in (i) above, as applied, meet their applicable emission limits, or iii. you demonstrate using the appropriate values in Table 7 to this subpart that the weighted average of all resins and gel coats for each resin type and application method meet the appropriate organic HAP contents.

Summary of Table 9 to 40 CFR Part 63, Subpart WWWW

For . . .	That must meet the following standards . . .	You have demonstrated initial compliance if . . .
a new or existing cleaning operation	not use cleaning solvents that contain HAP, except that styrene may be used in closed systems, and organic HAP containing materials may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin between storage and applying resin to the mold or reinforcement	the owner or operator submits a certified statement in the notice of compliance status that all cleaning materials, except styrene contained in closed systems, or materials used to clean cured resin from application equipment, contain no HAP.
a new or existing materials HAP-containing material storage operation	keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety	the owner or operator submits a certified statement in the notice of compliance status that all HAP-containing storage containers are kept closed or covered except when adding or removing materials, and that any bulk storage tanks are vented only as necessary for safety.
a new or existing mixing or BMC manufacturing operation	keep the mixer covers closed during mixing except when adding materials to the mixing vessels	the owner or operator submits a certified statement in the notice of compliance status that mixers closed except when adding materials to the mixing vessels.

Below is a breakdown of 40 CFR 63.5895(b - d).

In accordance with 40 CFR 63.5895(b), the permittee must monitor and collect data as specified in paragraphs (1) through (3) of this section.

(1) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation (or collect data at all required intervals) at all times that the affected source is operating.

(2) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes to this subpart, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control device and associated control system (at the time of permit issuance the permittee is not using a control device to comply).

(3) At all times, the permittee must maintain necessary parts for routine repairs of the monitoring equipment.

In accordance with 40 CFR 63.5895(c), the permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the permittee is meeting any organic HAP emissions limits based on an organic HAP emissions limit in Tables 3 or 5 to this subpart. The permittee must collect and keep records of resin and gel coat use, organic HAP content, and operation where the resin is used if the permittee is meeting any organic HAP content limits in Table 7 to this subpart if the permittee is averaging organic HAP contents. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied.

The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

In accordance with 40 CFR 63.5895(d), resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission as defined in §63.5810(a). However, the permittee must retain the records of resin and gel coat organic HAP content, and the permittee must include the list of these resins and gel coats and identify their application methods in the permittee's semiannual compliance reports. If after the permittee has initially demonstrated that a specific combination of an individual resin or gel coat, application method, and controls meets its applicable emission limit, and the resin or gel coat changes or the organic HAP content increases, or the permittee changes the application method or controls, then the permittee again must demonstrate that the individual resin or gel coat meets its emission limit as specified in paragraph (a) of §63.5810. If any of the previously mentioned changes results in a situation where an individual resin or gel coat now exceeds its applicable emission limit in Table 3 of this subpart, the permittee must begin collecting resin and gel coat use records and calculate compliance using one of the averaging options on a 12-month rolling average.

Below is a breakdown of 40 CFR 63.5900.

In accordance with 40 CFR 63.5900, the permittee must demonstrate continuous compliance with each standard in §63.5805 that applies according to the following methods:

- In accordance with §63.5900(a)(2), compliance with organic HAP emissions limits is demonstrated by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 or 5 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the appropriate organic HAP emissions limits, as discussed in §63.5895(d).
- In accordance with §63.5900(a)(3), compliance with the optional organic HAP content limits in Table 7 to this subpart is demonstrated by maintaining an average organic HAP content value less than or equal to the appropriate organic HAP contents listed in Table 7 to this subpart, on a 12-month rolling average, and/or by including in each compliance report a statement that resins and gel coats individually meet the appropriate organic HAP content limits in Table 7 to this subpart, as discussed in §63.5895(d).
- In accordance with §63.5900(a)(4), compliance with the work practice standards in Table 4 to this subpart is demonstrated by performing the work practice required for the permittee's operation.
- In accordance with §63.5900(b), the permittee must report each deviation from each standard in §63.5805 that applies to the permittee. The deviations must be reported according to the requirements in §63.5910.
- In accordance with §63.5900(c), during periods of startup, shutdown or malfunction, the permittee must meet the organic HAP emissions limits and work practice standards that apply to the permittee.

Permit Condition 4.18 – MACT Reporting

Summary of Table 14 to 40 CFR Part 63, Subpart WWWW

You must submit a(n)	The report must contain . . .	You must submit the report . . .
1. Compliance report	A statement that there were no deviations during that reporting period if there were no deviations from any emission limitations (emission limit, operating limit, opacity limit, and visible emission limit) that apply to you and there were no deviations from the requirements for work practice standards in Table 4 to this subpart that apply to you. If there were no periods during which the CMS, including CEMS, and operating parameter monitoring systems, was out of control as specified in §63.8(c)(7), the report must also contain a statement that there were no periods during which the CMS was out of control during the reporting period	Semiannually according to the requirements in §63.5910(b).
	The information in §63.10(d)(5)(i) if you had a startup, shutdown or malfunction during the reporting period, and you took actions consistent with your startup, shutdown, and malfunction plan	Semiannually according to the requirements in §63.5910(b).
2. An immediate startup, shutdown, and malfunction report if you had a startup, shutdown, or malfunction during the reporting period that is not consistent with your startup, shutdown, and malfunction plan	a. Actions taken for the event	By fax or telephone within 2 working days after starting actions inconsistent with the plan.
	b. The information in §63.10(d)(5)(ii)	By letter within 7 working days after the end of the event unless you have made alternative arrangements with the permitting authority. (§63.10(d)(5)(ii)).

7.7 CAM Applicability (40 CFR 64)

Individual permit units at facilities that are subject to Title V permitting requirements (Tier I permits) may be subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). 40 CFR Part 64 requires CAM for units that meet the following three criteria:

- 1) In accordance with 40 CFR 64.2(a)(1), the unit must have an emission limit for the pollutant;
- 2) In accordance with 40 CFR 64.2(a)(2), the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) In accordance with 40 CFR 64.2(a)(3), the unit must have a pre-control potential to emit of greater than the major source thresholds.

The lamination area and blue bottom area are limited by emission limits for both VOCs and PM₁₀. Within both the lamination and blue bottom areas there are units that have add-on controls such as fiberglass and cartridge filters. The facility as a whole has a pre-control potential to emit of VOCs greater than major source thresholds but there are no pollutant-specific emission units (PSEU) applicable to CAM with respect to VOC emissions. Therefore, CAM (Subpart 64) does not apply to this facility.

7.8 Acid Rain Permit (40 CFR 72-75)

BBS is not an affected facility as defined in 40 CFR 72 through 75. Acid Rain permit requirements are therefore not applicable.

8. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public.

9. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ will provide the proposed permit to EPA Region 10 for its review and comment.

Appendix A - Emissions Inventory

Table 3-1: Air Quality Permit NESHAP Analysis

Process Step	Process Feeds	Product code	2009 Feed Quantity (lbs)	Hazardous Air Pollutants (HAP) in Feed	HAP Content (MSDS wt%)	2009 HAP Quantity (lb)	HAP Conc. ^b (avg. wt%)	Subpart WWWW Emission Factor	Emission Factor ^c (lb HAP/ton feed)	Overall Emission Factor ^d (wt. lb HAP/tn fld)	Subpart WWWW Emission Limit	Emission Limit ^e (lb HAP/ton feed)	Overall Emission Limit (wt. lb HAP/tn fld)	2009 Total Emissions (ton HAP per yr)	Permit Multiplier: 99 ton HAP/yr	
Initiators	Norox	MEKP-9H	8736	diphenyl phthalate	43.0%	3756	30.4%									
	Norox Luperox	MCP-75 DDM-9	4462 4608	DMP,cumene,acroleins	37.0% 0.0%	1651 0										
1 Gel Coat	White gelcoat Initiator (calc'd) ^f	WG-TS-8045	131992	styrene, Co	30.9%	40786	30.9%		275		6. Open molding-gel coat b. white/off white gel coat	267				
	Bone gelcoat	WG-2X8113	7888	styrene, Co	35.9%	2911										
	Almond gelcoat	WG-2X8120	6383	styrene, Co	36.8%	2349										
	Linon gelcoat	WG-2X8125	1180	styrene, Co	37.0%	437										
	Bisque gelcoat	WG-2X8117	5366	styrene, Co	37.1%	1991	36.5%		366		6. Open molding-gel coat c. all other pigmented gel coating	377				
	Safas all colors	Granicoat	732	styrene, MMA	28.0%	205										
	GCP all colors	Amorflex	380	styrene, Co, MMA	34.0%	129										
	Initiator (calc'd)		444	DMP,cumene,acroleins	30.4%	135										
	Clear blend Initiator		577C9045	5700	styrene, MMA	50.0%	2850	48.6%		638		6. Open molding-gel coat f. clear production gel coat	522	178	36	2.76
				115	DMP,cumene,acroleins	30.4%	35									
2 Barrier	Barrier coat Initiator (calc'd)	VPRO-012	163052	styrene, Co	32.9%	53644	32.9%		292		6. Open molding-gel coat c. all other pigmented	377				
			3300	DMP,cumene,acroleins	30.4%	1002										
3 Resin and Fiber	Bulk resin	733-7954-xx	538706	styrene, Co	35.5%	190176										
	Resin	733-9650-xx	3800	styrene, Co	35.5%	1349										
	Resin	040-5885	7500	styrene	32.2%	2415	36.3%		81		2. Open molding- non-CRHS application	88				
	Duraglas	24059	1200	styrene	20.0%	240										
	Styrene Initiator (calc'd)	54940	9020	styrene	100.0%	9020										
			11276	DMP,cumene,acroleins	30.4%	3424										
			897705	lbs Total			35.0%	Overall HAP								

Sample Calculations:

a. initiator (calc'd) = 2009 quantity of initiator used with associated coating = Total 2009 initiator Use * 2009 assoc. GelBarrier/Resin Use / 2009 Total GelBarrier/Resin Use

2009 Total GelBarrier/Resin Use = 131992+7888+6383+1180+5366+732+380+5700+163052+535706+3800+7500+1200+9020 lbs = 879899 lbs

White Gelcoat initiator (calc'd) = (8736+4462+4608 lbs initiator in 2009) * (131992 lbs 2009 White Gelcoat) / (879899 lbs 2009 Total G/B/R Use) = 2671 lbs White Gelcoat initiator

b. HAP Conc. (avg. wt%) = Weight of HAP in combined 2009 coating / 2009 combined coating use

White gelcoat HAP Conc. = (40786 + 811) / (131992 + 2671) * 100% = 30.9%

c. individual Emission Factors from Table 1, Subpart WWWW of Part 63. Formula used dependent of whether %HAP is > or < .33%

30.9 wt% HAP White gelcoat Emission Factor = 0.445 * %HAP * 2000 = 0.445 * 0.309 * 2000 = 275 (Table 1.f. open molding with atomized spray gel coat application)

d. Overall Emission Factor = SUM(individual Coatings Emission Factor * Weight of individual Coatings) / Total Weight of Coatings

Total Weight of Coatings = 131992+2671+7888+6383+1180+5366+732+380+444+5700+115+163052+3500+535706+3800+7500+1200+9020+11276 = 897705 lbs

Overall Emission Factor = [275*(131992+2671) + 366*(7888+6383+1180+5366+732+380+444) + 638*(5700+115) + 292*(163052+3500) + 81*(535706+3800+7500+1200+9020+11276)] / 897705 = 160

e. individual Emission Limits from Table 3, Subpart WWWW of Part 63.

White gelcoat Emission Limit = 267 lb/ton (Table 3.6.b. Open Molding with white/off white pigmented gel coating)

f. Overall Emission Limit = SUM(individual Coatings Emission Limits * Weight of individual Coatings) / Total Weight of Coatings

Table 3-2: Chemical Use Calculation

Feed Type	Compounds	Product code(s)	2009 Quantity (lbs)	99 ton/yr Permit Multiplier ¹	Permit Analysis Quantity (lbs)
Adhesive	Plexus	MA 300	321	2.76	885
	Plexus	MA 320	221		609
Finishing	Trempro	644 Sealant	543		1497
	TRI Buffing Compound	TR-311	150		413
Foam Fill	Hydroseal Floor	1027-7-50S "A"	21972		60562
		1027-7-50S "B"	20382		56180
	Instapack Packing	Component "A"	14778		40733
		Component "B"	19928		54928
Gel & Barrier Coats	Ashland White	WG-TS-8045	131992		363814
	Ashland Colors	WG-2X8113	7888		21742
		WG-2X8120	6383		17594
		WG-2X8125	1180		3252
		WG-2X8117	5366		14790
	Valspar Clear	577C90045	5700		15711
	Safas all colors	Granicoat	732		2018
	GCP all colors	Armorflex	380		1047
Barrier coat	VPRO-012	163052	449426		
Initiators	Norox	MEKP- 9H	8736		24079
		MCP-75	4462		12299
	Luperox	DDM-9	4608		12701
Paints	BASF Bases and Colors	UNO HD/SC	253		697
	BASF Reducer	UR50	60		165
	BASF Hardener	DH46ZZ	35		96
Resins	Resins	Hexion	535706		1476584
		Eastman	3800		10474
		Cook	7500		20672
		Duraglass	1200		3308
	Styrene Monomer	Ashland 54940	9020		24862
Solvents	Acetone		76719	211463	
	Denatured alcohol		200	551	
Waxes & Parting Agents	Frekote	FRP-NC	1050	2894	
	Frekote	FMS	790	2178	
	TRI	TR-104	86	237	
	TRI	TR-210	50	138	
	TRI	TR-111	72	198	
	Partall	Paste #2	375	1034	
	Partall	Film #10	36	99	

Notes: 1. See Table 3-1

Table 3-4: Facility-Wide Combustion Emissions

FACILITY-WIDE DUTY:

12.865 MMBtu/hr /

1,020 MMBtu/MMscf =

EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)

1.26E-02 MMscf/hr

Fuel Use:

0.303 MMscf/day

110.488 MMscf/year

Operating Assumptions:

24 hr/day

8,760 hr/yr

Criteria Air Pollutants	Emission Factor	Emissions		
		lb/MMscf	lb/hr	T/yr
NO2	100	1.26E+00	5.52E+00	
CO	84	1.06E+00	4.64E+00	
PM10	7.6	9.59E-02	4.20E-01	
		9.59E-02	4.20E-01	
SOx	0.6	7.57E-03	3.31E-02	
		7.57E-03	3.31E-02	
VOC	5.5	6.94E-02	3.04E-01	
Lead	0.0005	6.31E-06	2.76E-05	lb/quarter
Lead, continued			5.37E-03	
TOTAL			1.09E+01	T/yr

Modeling Threshold	Modeling Required ?	Modeling Threshold	Modeling Required ?
2002 Guidance		Case-by-Case	
1 T/yr	YES	7 T/yr	No
14 lb/hr	No	70 lb/hr	No
0.2 lb/hr	No	0.9 lb/hr	No
1 T/yr	No	7 T/yr	No
0.2 lb/hr	No	0.9 lb/hr	No
1 T/yr	No	7 T/yr	No
40 T/yr	No		
0.6 T/yr	No		
10 lb/mo	No		

Note: 100 lb/mo Pb in guidance reduced by factor of 10 based on latest Pb NAAQS (reduced in 2008 from 1.5 ug/m3 to 0.15 ug/m3)

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)	lb/MMscf	lb/hr	EL (lb/hr)	Exceeds EL/Modeling Required?
2-Methylnaphthalene	2.40E-05	3.03E-07	9.10E-05	No
3-Methylchloranthrene	1.80E-06	2.27E-08	2.50E-06	No
Acenaphthene	1.80E-06	2.27E-08	9.10E-05	No
Acenaphthylene	1.80E-06	2.27E-08	9.10E-05	No
Anthracene	2.40E-06	3.03E-08	9.10E-05	No
Benzo(a)anthracene	1.80E-06	2.27E-08	9.10E-05	See POM
Benzo(a)pyrene	1.20E-06	1.51E-08	2.00E-06	See POM
Benzo(b)fluoranthene	1.80E-06	2.27E-08	9.10E-05	See POM
Benzo(g,h,i)perylene	1.20E-06	1.51E-08	9.10E-05	No
Benzo(k)fluoranthene	1.80E-06	2.27E-08	9.10E-05	See POM
Chrysene	1.80E-06	2.27E-08	9.10E-05	See POM
Dibenzo(a,h)anthracene	1.20E-06	1.51E-08	9.10E-05	See POM
Dichlorobenzene	1.20E-03	1.51E-05	9.10E-05	No
Fluoranthene	3.00E-06	3.78E-08	9.10E-05	No
Fluorene	2.80E-06	3.53E-08	9.10E-05	No
Indeno(1,2,3-cd)pyrene	1.80E-06	2.27E-08	9.10E-05	See POM
Naphthalene	6.10E-04	7.69E-06	3.33	No
Naphthalene	6.10E-04	7.69E-06	9.10E-05	No
Phenanthrene	1.70E-05	2.14E-07	9.10E-05	No
Pyrene	5.00E-06	6.31E-08	9.10E-05	No
Polycyclic Organic Matter (POM)	7-PAH G	1.44E-07	2.00E-06	No
Non-PAH HAPs				
Benzene	2.10E-03	2.65E-05	8.00E-04	No
Formaldehyde	7.50E-02	9.46E-04	5.10E-04	YES
Hexane	1.80E+00	2.27E-02	12	No
Toluene	3.40E-03	4.29E-05	25	No
Non-HAP Organic Compounds				
7,12-Dimethylbenz(a)anthracene	1.60E-05	2.02E-07		
Butane	2.10E+00	2.65E-02		
Ethane	3.10E+00	3.91E-02		
Pentane	2.60E+00	3.28E-02	118	No
Propane	1.60E+00	2.02E-02		
Metals (HAPs)				
Arsenic	2.00E-04	2.52E-06	1.50E-06	YES
Barium	4.40E-03	5.55E-05	0.033	No
Beryllium	1.20E-05	1.51E-07	2.80E-05	No
Cadmium	1.10E-03	1.39E-05	3.70E-06	YES
Chromium	1.40E-03	1.77E-05	0.033	No
Cobalt	8.40E-05	1.06E-06	0.0033	No
Copper	8.50E-04	1.07E-05	0.013	No
Manganese	3.80E-04	4.79E-06	0.067	No
Mercury	2.60E-04	3.28E-06	0.003	No
Molybdenum	1.10E-03	1.39E-05	0.333	No
Nickel	2.10E-03	2.65E-05	2.70E-05	No
Selenium	2.40E-05	3.03E-07	0.013	No
Vanadium	2.30E-03	2.90E-05	0.003	No
Zinc	2.90E-02	3.66E-04	0.667	No

Case-by-Case Modeling Thresholds may be used ONLY with prior DEQ Approval: *Approved by DEQ (C.Robinson, 3/12/2010)*

- requires air dispersion modeling

Total Combustion HAPs = 0.106 ton/yr

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

Table 3-5a: North Unit Heaters (EU15) Emissions

EU15 Duty

1.5 MMBtu/hr /

1,020 MMBtu/MMscf =

EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)

1.47E-03 MMscf/hr

Fuel Use:

Operating Assumptions:

24 hr/day

0.035 MMscf/day

8,760 hr/yr

12.882 MMscf/year

Criteria Air Pollutants	Emission Factor lb/MMscf	Emissions		Emission Source	
		lb/hr	T/yr		
NO2	100	1.47E-01	6.44E-01	EF15	
CO	84	1.24E-01	5.41E-01		
PM10	7.6	1.12E-02	4.90E-02		
		1.12E-02	4.90E-02		
SOx	0.6	8.82E-04	3.86E-03		
		8.82E-04	3.86E-03		
VOC	5.5	8.09E-03	3.54E-02		
Lead	0.0005	7.35E-07	3.22E-06		
Lead, continued			5.37E-03		lb/quarter
TOTAL			1.27E+00		T/yr

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)				Emission Source
	lb/MMscf	lb/hr	EL (lb/hr)	
Formaldehyde	7.50E-02	1.10E-04	5.10E-04	EF15
Arsenic	2.00E-04	2.94E-07	1.50E-06	
Cadmium	1.10E-03	1.62E-06	3.70E-06	
Cobalt	8.40E-05	1.24E-07	0.0033	

- requires air dispersion modeling

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

Table 3-5b: East Unit Heaters (EU16) Emissions

EU16 Duty

1.2 MMBtu/hr /

1,020 MMBtu/MMscf =

EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)

1.18E-03 MMscf/hr

Fuel Use:

Operating Assumptions:

24 hr/day

0.028 MMscf/day

8,760 hr/yr

10.306 MMscf/year

Criteria Air Pollutants	Emission Factor lb/MMscf	Emissions		Emission Source	
		lb/hr	T/yr		
NO2	100	1.18E-01	5.15E-01	EF16	
CO	84	9.88E-02	4.33E-01		
PM10	7.6	8.94E-03	3.92E-02		
		8.94E-03	3.92E-02		
SOx	0.6	7.06E-04	3.09E-03		
		7.06E-04	3.09E-03		
VOC	5.5	6.47E-03	2.83E-02		
Lead	0.0005	5.88E-07	2.58E-06		
Lead, continued			5.37E-03		lb/quarter
TOTAL			1.02E+00		T/yr

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)				Emission Source
	lb/MMscf	lb/hr	EL (lb/hr)	
Formaldehyde	7.50E-02	8.82E-05	5.10E-04	EF16
Arsenic	2.00E-04	3.00E+00	1.50E-06	
Cadmium	1.10E-03	1.29E-06	3.70E-06	
Cobalt	8.40E-05	9.88E-08	0.0033	

- requires air dispersion modeling

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

Table 3-5c: South Unit Heaters (EU17) Emissions

EU17 Duty

0.6 MMBtu/hr /

1,020 MMBtu/MMscf =

5.88E-04 MMscf/hr

EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)

Operating Assumptions:

24 hr/day

8,760 hr/yr

Fuel Use:

0.014 MMscf/day

5.153 MMscf/year

Criteria Air Pollutants	Emission Factor lb/MMscf	Emissions		Emission Source
		lb/hr	T/yr	
NO2	100	5.88E-02	2.58E-01	EF16
CO	84	4.94E-02	2.16E-01	
PM10	7.6	4.47E-03	1.96E-02	
		4.47E-03	1.96E-02	
SOx	0.6	3.53E-04	1.55E-03	
		3.53E-04	1.55E-03	
VOC	5.5	3.24E-03	1.42E-02	
Lead	0.0005	2.94E-07	1.29E-06	
Lead, continued			5.37E-03	
		TOTAL	5.09E-01	

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)				Emission Source
	lb/MMscf	lb/hr	EL (lb/hr)	
Formaldehyde	7.50E-02	4.41E-05	5.10E-04	EF17
Arsenic	2.00E-04	1.18E-07	1.50E-06	
Cadmium	1.10E-03	6.47E-07	3.70E-06	
Cobalt	8.40E-05	4.94E-08	0.0033	

- requires air dispersion modeling

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

Table 3-6: Make-up Air Unit #1 (MAU1) Emissions

MAU1 Duty

8.565 MMBtu/hr /

1,020 MMBtu/MMscf =

8.40E-03 MMscf/hr

EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)

Fuel Use:

0.202 MMscf/day

73.558 MMscf/year

Operating Assumptions:

24 hr/day

8,760 hr/yr

Criteria Air Pollutants	Emission Factor lb/MMscf	Emissions		Emission Source	
		lb/hr	T/yr		
NO2	100	8.40E-01	3.68E+00	EF9 & 10	
CO	84	7.05E-01	3.09E+00		
PM10	7.6	6.38E-02	2.80E-01		
		6.38E-02	2.80E-01		
SOx	0.6	5.04E-03	2.21E-02		
		5.04E-03	2.21E-02		
VOC	5.5	4.62E-02	2.02E-01		
Lead	0.0005	4.20E-06	1.84E-05		
Lead, continued			5.37E-03		lb/quarter
TOTAL			7.27E+00		T/yr

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)				Emission Source
	lb/MMscf	lb/hr	EL (lb/hr)	
Formaldehyde	7.50E-02	6.30E-04	5.10E-04	EF9 & 10
Arsenic	2.00E-04	1.68E-06	1.50E-06	
Cadmium	1.10E-03	9.24E-06	3.70E-06	
Cobalt	8.40E-05	7.05E-07	0.0033	

- requires air dispersion modeling

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

Table 3-7: Make-up Air Unit #2 (MAU1) Emissions

MAU2 Duty

EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)

Operating Assumptions: **1** MMBtu/hr / **1,020** MMBtu/MMscf = **9.80E-04** MMscf/hr **Fuel Use:**
24 hr/day **0.024** MMscf/day
8,760 hr/yr **8.588** MMscf/year

Criteria Air Pollutants	Emission Factor lb/MMscf	Emissions		Emission Source
		lb/hr	T/yr	
NO2	100	9.80E-02	4.29E-01	EF11 & 12
CO	84	8.24E-02	3.61E-01	
PM10	7.6	7.45E-03	3.26E-02	
		7.45E-03	3.26E-02	
SOx	0.6	5.88E-04	2.58E-03	
		5.88E-04	2.58E-03	
VOC	5.5	5.39E-03	2.36E-02	
Lead	0.0005	4.90E-07	2.15E-06	
Lead, continued			5.37E-03	
		TOTAL	8.49E-01	

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)				Emission Source
	lb/MMscf	lb/hr	EL (lb/hr)	
Formaldehyde	7.50E-02	7.35E-05	5.10E-04	EF11 & 12
Arsenic	2.00E-04	1.96E-07	1.50E-06	
Cadmium	1.10E-03	1.08E-06	3.70E-06	
Cobalt	8.40E-05	8.24E-08	0.0033	

- requires air dispersion modeling

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

Table 4-1: Accent Booth (EU14) Emissions Analysis

Coating ID Name Manufacturer	Permit Analysis Usage			HAP/TAP Component	CAS Number	Comp. Conc. (MSDS, wt%) max	Coating Retention (%) ²	Component Uncontrolled Emissions	
	lb/yr	days/yr	lb/day					lb/day	lb/yr
DH46 Hardener BASF	96	100	1.0	Hexamethylene Diisocyanate	822-06-0	1.0%	0.0%	0.010	0.96
				Methyl Amyl Ketone	110-43-0	35%	0.0%	0.338	33.8
UNO-HD SC403 Black BASF	697		7.0	Aluminum (metal and OH)	7429-90-5	10.0%	25.0%	0.52	52.3
				Aromatic Hydrocarbon	64742-95-6	25.0%	0.0%	1.74	174.3
				n-Butyl Acetate	123-86-4	30.0%	0.0%	2.09	209.2
				Carbon Black	1333-86-4	5.0%	25.0%	0.26	26.2
				Ethyl Benzene	100-41-4	3.0%	0.0%	0.21	20.9
				1-Methoxy 2-Propyl Acetate	108-65-6	10.0%	0.0%	0.70	69.7
				MIBK	108-10-1	10.0%	0.0%	0.70	69.7
				Stoddard Solvent	8052-41-3	3.0%	0.0%	0.21	20.9
UR50 Mid Temp Reducer BASF	165	1.7	Aromatic Hydrocarbon	64742-##	15.0%	0.0%	0.25	24.8	
			n-Butyl Acetate	123-86-4	65.0%	0.0%	1.07	107.5	
			1-Methoxy 2-Propyl Acetate	108-65-6	20.0%	0.0%	0.33	33.1	
			Stoddard Solvent	8052-41-3	15.0%	0.0%	0.25	24.8	
				Trimethyl Benzene	25551-13-7	3.0%	0.0%	0.05	5.0

Toxic Air Pollutants - Accent Booth Summary	TAP Type (24 hr or Annual Averaging)	Screening Emission Level (lb/hr)	Booth Uncontrolled Emissions (lb/hr) ^{1,3}	Booth Uncontrolled Emissions (% of EL)
Aluminum	585 (24 hr)	0.667	0.022	3.3%
n-Butyl Acetate	585 (24 hr)	47.3	0.13	0.3%
Carbon Black	585 (24 hr)	0.23	0.011	5%
Ethyl Benzene	585 (24 hr)	29	0.01	0.0%
Hexamethylene diisocyanate	585 (24 hr)	0.002	0.0004	20%
1-Methoxy 2-Propyl Acetate	585 (24 hr)	24	0.04	0.2%
Methyl Amyl Ketone	585 (24 hr)	16	0.0	0.1%
MIBK	585 (24 hr)	13.7	0.03	0.2%
Stoddard Solvent	585 (24 hr)	35	0.02	0.1%
Toluene (Aromatic HCs)	585 (24 hr)	25	0.08	0.3%
Trimethyl Benzene	585 (24 hr)	8.2	0.03	0.4%
Xylene	585 (24 hr)	29	0.03	0%

Appendix B - Facility Comments for Draft Permit

The following comments were received from the facility on March 1, 2013:

Facility Comment: Remove the insignificant sources from the list of regulated sources.

DEQ Response: Table 5.1 has been revised in the Statement of Basis to remove the building unit heaters and Make-up Air Unit 2 because these are insignificant sources. Table 4.1 in the permit has been revised in the same manner.

Facility Comment: Remove the detailed list of General Conditions and Subpart WWWW table of emission equations and emission limits in favor of brief descriptions and references to the applicable federal rule. Many of the regulatory references deleted are listed in subsequent sections of the draft permit. For example, the requirements listed in the original Section 4.11 MACT Compliance Demonstration Requirements are repeated in the sections MACT Notifications, MACT Compliance Reporting, MACT Compliance Report, MACT Deviation Reporting, MACT Semiannual Monitoring Report, Other MACT Reports, etc.

DEQ Response: The facility has requested that the Tier I Operating Permit incorporate the same high level citation of 40 CFR 63 Subpart WWWW as found in the underlying PTC, P-2010.0047. DEQ has revised the permit to include the high level citation and has moved the breakdown of 40 CFR 63 Subpart WWWW to section 7.6 of the Statement of Basis.

Facility Comment: Delete tables or correct various table emission limit and work practice references (Subpart WWWW Table 3 and Table 5 missing “open molding – non CR/HS”, Table 4 missing 5 of 8 operation specific work practice standards, Table 8 missing 5 operation-specific work practice standards, and Table 9 “closed molding with injection” and 5 other operation-specific compliance standards).

DEQ Response: These tables were included and summarized based on the information provided in the PTC application. These tables have been revised and/or deleted and inserted in section 7.6 of the Statement of Basis.

Facility Comment: Delete proposed permit condition 4.4. The MACT Alternative Emission Limitations (63.5805) do not apply to Best Bath. The permit analysis was based on never exceeding 99 tons/yr HAP to avoid this alternative limit. Best Bath cannot exceed 100 tons/yr HAP without exceeding the VOC limit in the permit.

DEQ Response: Permit Condition 4.4 has been removed.