



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

August 29, 2008

Certified Mail No. 7190 0596 0014 0000 3618

Werner Nennecker, President
Acsys, Inc.
1677 E. Miles Ave., Suite 101
Hayden Lake, ID 83835

RE: Facility ID No. 055-00075, Acsys, Inc., Post Falls
Final Permit Letter

Dear Mr. Nennecker:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2008.0101 to Acsys, Inc. for the construction of a panelized building system facility located at Post Falls, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on June 3, 2008. This permit is effective immediately and does not release Acsys, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Coeur d'Alene Regional Office, 2110 Iron Wood Parkway, Coeur d'Alene, ID 83814, Fax (208) 769-1404.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Ralph Paul, Air Quality Compliance Officer, at (208) 769-4609 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition

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for a contested case, I encourage you to contact Carole Zundel at (208) 373-0477 or carole.zundel@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script that reads "Mike Simon". The signature is written in black ink and is positioned above the printed name and title.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\CZ\hp

Project No. P-2008.0101

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
EPS	expandable polystyrene
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
MMBtu/hr	million British thermal units per hour
PTC	permit to construct
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2008.0101

Permittee:	Acsys, Inc.
Location:	Post Falls, Idaho

Facility ID No. 055-00075

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 The purpose of this permit is to issue the initial permit to construct for this facility

Regulated Sources

1.4 Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Hurst boiler Manufacturer: Hurst Model: S400-80 Capacity: 80 HP and 3.36 MMBtu/hr Date of construction: 2007	None
2	Panel mold Manufacturer: Kornylak Model: M-18 Capacity: 2,000 lb/day Date of construction: 2000	None
2	PS-50 EPS pre-expander Manufacturer: Fangyuan Plastics Machinery Model: PSJ-50 Capacity: 85 kg/hr, 187 lb/hr Date of construction: 2008	None

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2. PRODUCTION FACILITY

2.1 Process Description

Acsys utilizes a two step process in the manufacture of building panels. The first step converts polystyrene beads into expanded beads through a steam reactor. The raw polystyrene bead is impregnated with pentane by the supplier. These beads typically contain 5-7% pentane by weight. The expansion process involves exposing the bead to steam at temperatures of around 215° F. This vaporizes the pentane, causing the beads to foam and expand. About 85% of the available pentane is released in the expansion process.

The next step of the process converts these expanded beads into a solid block around a steel structural component through a molding process. The process brings the expanded polystyrene (EPS) beads into a mold where they are fused together by temperature and pressure using steam. Nearly all of the remaining 15% of the available pentane is released in the molding process.

2.2 Emissions Control Description

Table 2.1 PRODUCTION FACILITY DESCRIPTION

Emissions Unit / Process	Emissions Control Device
Hurst boiler	None
Panel mold	None
EPS pre-expander	None

Emissions Limits

2.3 Opacity Limit

Emissions from the boiler stack, or any other stack, vent, or functionally equivalent opening associated with the boiler, 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.

Operating Requirements

2.4 Pentane Limit

No EPS beads shall be used that contain pentane in excess of 7% by weight.

2.5 Fuel Use Requirement

The boiler shall be fired on natural gas only.

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Monitoring and Recordkeeping Requirements

2.6 Pentane Monitoring

The permittee shall maintain receipts of all deliveries of EPS beads made to the facility. The receipts shall state the actual weight percentage of pentane contained within the EPS beads. In addition, the receipts shall state the method(s) used to determine the weight percent of pentane contained within the EPS beads. These records shall be maintained on site for a minimum of five years and be made available to DEQ representatives upon request.

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Location: Post Falls, Idaho

Facility ID No. 055-00075

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

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

[Idaho Code §39-101, et seq.]

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

[IDAPA 58.01.01.211, 5/1/94]

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

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

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

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

[Idaho Code §39-108]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
- a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this 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 and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

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Permittee:	Acsys, Inc.	Facility ID No. 055-00075
Location:	Post Falls, Idaho	

Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

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

[IDAPA 58.01.01.123, 5/1/94]

False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

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

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