



# **Air Quality Permitting Statement of Basis**

**August 4, 2004**

**Permit to Construct No. P-040022**

**Pre-Cote Industries, Boise**

**Facility ID No. 001-00197**

Prepared by:

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AIR QUALITY DIVISION**

**FINAL PERMIT**

## 1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for issuing permits to construct.

## 2. APPLICATION SCOPE

The Department of Environmental Quality (DEQ) received a letter on July 19, 2004 from Pre-Cote Industries requesting that the following administrative corrections be made to Permit to Construct P-030036:

- Change toxic air pollutant (TAP) monitoring and recordkeeping requirements from hourly to daily.
- Incorporate TAP emission limits into coating throughput limit permit condition.
- Delete TAP emission monitoring requirement for non-materials inventory list coatings.
- Correct permit condition reference.
- Clarify definition of mass fraction in Permit Condition 2.8.

No permit application or processing fees are required for this Permit to Construct (PTC) revision because the corrections were similar to typographical errors, which are exempt from fees. For the same reason, no public notice or public comment period is required.

## 3. PERMIT CONDITIONS

Permit Conditions 2.8, 2.9, and 2.12 were revised to change hourly monitoring and recordkeeping requirements to daily or a 24-hour average. This change was made because the most stringent standard Pre-Cote must comply with are the TAPs ambient concentration limits for non-carcinogens, which are based on a 24-hour average. Therefore, daily tracking is required to show compliance with the daily standard.

Permit Condition 2.3.3 could not be combined with Permit Condition 2.8 as proposed because the proposed language eliminated the portions of Permit Condition 2.3.3 that clearly restrict the emission rate of TAPs and document the origin of the conversion factors in the equations. Also, because the TAP limits are emission limits, it is more appropriate and less confusing to include the limit in the emission limit section of the permit, rather than having the limit as a part of an operational requirement.

Permit Condition 2.11 requires monitoring and recording of the daily allowable emissions for each TAP contained in the proposed non-materials inventory list coating. Pre-Cote's letter requested that this permit condition be removed because it corresponds to Permit Condition 2.3.3, which was also requested to be removed. Regardless of whether Permit Condition 2.3.3 is combined with Permit Condition 2.8, daily monitoring and recording of daily allowable TAP emissions will be required in order to track compliance with TAP emission limits established by air dispersion modeling of the facility's operational specifications and the concentration limits from IDAPA 58.01.01.585 and 586. Therefore, Permit Condition 2.11 will remain in the permit.

#### 4. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that Pre-Cote Industries be issued PTC No. P-040022 for the corrections in Section 2 of this memorandum.

CZ/sd

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