

Statement of Basis

**Permit to Construct No. P-2012.0050
Project ID 61096**

**Spunstrand Inc.
Wallace, Idaho**

Facility ID 079-00038

Final

**September 7, 2012
Dan Pitman, P.E.
Permit Writer**

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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FACILITY INFORMATION

Description

Spunstrand manufactures reinforced duct work, pipes, tubing and tanks using a filament winding method.

Application Scope

This PTC is a revision of an existing PTC. See the current Tier I permit statement of basis for the permitting history.

The applicant has proposed to use a baghouse to control emissions from trimming and cutting operations instead of cyclone as required by the current permit.

Application Chronology

July 19, 2012	DEQ received an application
July 23, 2012	DEQ received the application fee.
July 31, 2012	DEQ determined that the application was complete.
July 31, 2012	DEQ made available the draft permit and statement of basis for peer and regional office review.
August 1, 2012	DEQ made available the draft permit and statement of basis for applicant review.
August 28, 2012	DEQ received the permit processing fee.

TECHNICAL ANALYSIS

Emissions Inventories

The current permit requires that a cyclone be used to control emissions from trimming and cutting operations. Spunstrand has proposed to control emissions using a baghouse instead of a cyclone, no other process changes are proposed. The use of baghouse instead of a cyclone will result in a reduction of particulate matter emissions though the current permitted PM₁₀ emission rate remains the same (14.4 lb/day).

Ambient Air Quality Impact Analyses

This permitting action does not result in an increase of emissions allowed by the permit. Therefore an ambient impact analysis is not required.

REGULATORY ANALYSIS

The regulatory status of the facility does not change as a result of this permit. The regulatory status of the facility may be seen in the September 19, 2007 Statement of Basis that supports the issuance of the current permit.

As requested, in accordance with IDAPA 58.01.01.209.05.a, the terms of the PTC will be incorporated into the Tier I permit at the time of renewal.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Existing Permit Condition 2.2 & 2.4

These permit conditions were revised by removing the reference to a cyclone and adding a requirement to use baghouse. The permittee is allowed to use a different control device provide the device is guaranteed by the manufacturer to control PM₁₀ with a 90% or greater control efficiency and complies with all other permit conditions including the requirement to prepare a procedures document and to take corrective action if visible emissions are observed from the control device.

Existing Permit Condition 2.8

This existing permit condition required the operation and maintenance of a cyclone. All references to the cyclone have been deleted and DEQ's standard permit language for baghouses has been added.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.

APPENDIX A – PROCESSING FEE