



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippetts, Director

July 12, 2016

Blair Raymond, Facility permitting contact
OrePac Building Products
5500 S. Federal Way
Boise, ID 83716

RE: Facility ID No. 001-00302, OrePac Building Products, Boise
Final Permit Letter

Dear Mr. Raymond:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2014.0039 Project 61678 to OrePac Building Products, located at Boise to revise coating usage limits. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received March 17, 2016.

This permit is effective immediately and replaces PTC No. P-2014.0039, issued on September 22, 2015. This permit does not release OrePac Building Products from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Thomas Krinke, Air Quality Compliance Officer, at (208) 373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that 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 for a contested case, I encourage you to contact Tom Burnham at (208) 373-0502 or tom.burnham@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon". The signature is written in a cursive style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\tb

Permit No. P-2014.0039 PROJ 61678

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee OrePac Building Products
Permit Number P-2014.0039
Project ID 61678
Facility ID 001-00302
Facility Location 5500 South Federal Way
Boise, Idaho 83716-9617

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued July 12, 2016



Tom Burnham, Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) to revise coating usage limits in permit.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2014.0039, issued on September 22, 2015.

Regulated Sources

- 1.4 Table 1 lists all sources of regulated emissions in this permit.

Table 1 REGULATED SOURCES

Sources	Control Equipment
<u>Make-Up Air Unit, MAU1:</u> Manufacturer: Weather-Rite Model: MAU TT-230-VTL Manufacture Date: April 2013 Heat input rating: 5.127 MMBtu/hr Fuel: Natural Gas	None Restriction on Fuel Type
<u>Spray Gun:</u> Manufacturer: AirPro Model: 1.4 Type: HVLP Transfer Efficiency: 60%	<u>Paint Booth: PB1</u> Name/Type: Custom Open Face Paint Booth Construction Date: March 1, 2014 Filter, Control Efficiency: 99.43% or greater Limit on the Type and Volume of Material Usage
<u>Spray Gun:</u> Manufacturer: AirPro Model: 3 Type: HVLP Transfer Efficiency: 60%	
Automated Spray Guns HVLP or Higher	<u>Paint Booth: PB2</u> Name/Type: Custom Partially Enclosed Linear Paint Booth Construction Date: March 1, 2014 Filter, Control Efficiency: 99.43% or greater Limit on the Type and Volume of Material Usage
<u>Spray Gun:</u> Manufacturer: Kremlin-Rexson Model: X-Cite Type: HVLP Transfer Efficiency: 84%	<u>Paint Booths: PB3 and PB4</u> Manufacturer: Unibilt Name/Type: Conveyor Linear Open Face Paint Booths Construction Date: March 1, 2014 Filter, Control Efficiency: 99.43% or greater Limit on the Type and Volume of Material Usage
<u>Spray Gun:</u> Manufacturer: Anest Iwata Model: LPH-200 Type: HVLP Transfer Efficiency: 60%	
<u>Infrared Curing Oven, IO1:</u> Manufacturer: Unibilt Power: Electricity	None

2 Door and Door-Frame Coating Operation

2.1 Process Description

OrePac Building Products (OrePac) is a door, door-frame, and trim coating facility that has four spray paint booths. The four paint booths are located in one room where an air make-up unit supplies pressurized air to the room. Filters are used for control of particulate emissions. Drying and paint curing is done just outside of Paint Booth 1 and Paint Booth 2. The products from Paint Booth 3 and Paint Booth 4 are dried and cured as the products pass through an infrared oven on a suspended conveyer. The processes include application of coatings via HVLP (or equivalent) paint guns.

2.2 Emissions Control Description

The paint booths utilize filters for control of particulate matter emissions from the door and door frame coating operation. In addition, HVLP (or equivalent) paint guns are used to minimize PM₁₀ and VOC emissions from painting. The HVLP spray equipment will control PM₁₀ and VOC emissions by having more paint transfer to the desired surfaces than traditional coating equipment.

Table 2 DOOR AND DOORFRAME COATING OPERATION DESCRIPTION

Emissions Units / Processes	Emission Control Devices	Emission Points
Paint spray booths	Paint spray booths filter system HVLP paint guns	Paint booths stack exhaust
Infrared drying oven	None	Infrared drying oven stack exhaust

Emission Limits

2.3 Non-carcinogenic Toxic Air Pollutant (TAP) Limits

Each calendar day emissions of non-carcinogenic TAPs from the facility, including but not limited to TAPs emissions from paints, enamels, lacquers, and natural gas combustion from the heaters, shall not exceed the EL (lb/hr) multiplied by 24 for TAPs listed in IDAPA 58.01.01.585, or the acceptable ambient concentration (mg/m³).

[7/12/2016]

2.4 Carcinogenic Toxic Air Pollutant (TAP) Limits

Each month the consecutive 12-month emissions of carcinogenic TAPs from the facility, including but not limited to TAPs emissions from paints, enamels, lacquers, and natural gas combustion from the heaters, shall not exceed the EL (lb/hr) multiplied by 8760 for TAPs listed in IDAPA 58.01.01.586, or the acceptable ambient concentration (µg/m³).

[7/12/2016]

2.5 Hazardous Air Pollutant (HAP) Limits

- Emissions of any single Hazardous Air Pollutant (HAP) from the entire facility shall not equal or exceed 10 tons per any consecutive 12-calendar month period.
- Emissions of any aggregate combination of HAPs from the entire facility shall not equal or exceed 25 tons per any consecutive 12-calendar month period.

[7/12/2016]

2.6 Coating Solids (PM) Limit

Each calendar day the total solids from coatings used in operations, including, but not limited to paints, enamels, lacquers, divided by the hours of operations for that calendar day shall not exceed 101 pounds per hour.

[7/12/2016]

2.7 Coating VOC Limit

Each month the total VOC from coatings used, including, but not limited to paints, enamels, lacquers, shall be limited to less than 100 tons per any consecutive 12 month period.

[7/12/2016]

2.8 Opacity Limit

Emissions from the stacks or functionally equivalent openings associated with the paint booths and infrared drying oven 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.

2.9 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776.

Operating Requirements

2.10 Permitted Fuel

The heaters and rooftop units shall only combust natural gas as fuel.

2.11 Spray Gun and Spray Booth Filter System

- All coating at this facility shall be conducted within the booth area, with filter system in place, and exhaust fans operating.
- All painting shall be conducted with HVLP spray equipment with minimum 60% transfer efficiency as documented by the spray gun manufacturer.
- The permittee shall install, maintain, and operate according to the manufacturer's specifications and recommendations, a spray booth filter system or a preparation station filter system with a minimum control efficiency of 99.43% for PM₁₀ emissions as documented by the filter manufacturer.
- The permittee shall follow the operation and maintenance manual which will include the manufacturers specifications and procedures used to determine when replacement of the filters are required to maintain the 99.43% efficiency.
- The permittee shall keep a record regarding the when the filters are changed, the frequency of changes, and the method used to determine when the change was necessary.

[7/12/2016]

Monitoring and Recordkeeping Requirements

2.12 Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with the Odors Permit Condition. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.13 Material Usage Records

The permittee shall monitor and record daily the usage of all VOC, Solids, HAP and TAP containing materials that emit air pollution including but not limited to paints, enamels, lacquers, and solvents. Documentation of all records and calculations shall be maintained on-site in accordance with General Provisions of this permit.

[7/12/2016]

2.14 Non-carcinogenic TAPs Emissions Monitoring Requirements

- Using the material usage records, the permittee shall monitor and record daily the individual non-carcinogenic TAP (as listed in IDAPA 58.01.01.585) emissions from the facility in order to demonstrate compliance with the TAPs emissions limits in Permit Condition 2.3.
- If any of the individual non-carcinogenic TAP calendar day total exceeds 24 times the screening emissions level (EL) specified in IDAPA 58.01.01.585, a modeling analysis shall be conducted to demonstrate compliance with the acceptable ambient concentration (mg/m^3) (for TAPs listed in IDAPA 58.01.01.585).
- Documentation of all calculations and modeling analysis shall be maintained on-site in accordance with General Provisions of this permit.

[7/12/2016]

2.15 Carcinogenic TAPs Emissions Monitoring Requirements

- Using the material usage records, the permittee shall monitor and record monthly the individual carcinogenic TAP (as listed in IDAPA 58.01.01.586), emissions from the facility during the previous 12-month consecutive period in order to demonstrate compliance with the TAPs emissions limits in Permit Condition 2.4.
- If any individual carcinogenic TAP consecutive 12-month total exceeds 8760 times the screening emissions level (EL) specified in IDAPA 58.01.01.586, a modeling analysis shall be conducted to demonstrate compliance with the acceptable ambient concentration ($\mu\text{g}/\text{m}^3$) (for TAPs listed in IDAPA 58.01.01.586).
- Documentation of all calculations and modeling analysis shall be maintained on-site in accordance with General Provisions of this permit.

[7/12/2016]

2.16 Criteria Pollutant Emissions Monitoring Requirements

Using the material usage records, each month the permittee shall monitor and record the individual and total HAP emissions from the facility during the previous consecutive 12-month period in order to demonstrate compliance with the HAP emissions limits in Permit Condition 2.5 and Coating Solids limit is Permit Condition 2.6. All emissions calculations shall be maintained on-site in accordance with General Provisions of this permit.

[7/12/2016]

Reporting Requirements

- 2.17 Each year the permittee shall submit a report by May 1st on all TAP modeling analyses that have been conducted during the previous 12 month period. The report shall document the analyses with sufficient detail, including documentation of all calculations and electronic copies of modeling files, so that DEQ can verify the analysis. The report shall be sent to:

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

The report shall be titled: OrePac – Permit Required Modeling Report.

[7/12/2016]

3 General Provisions

General Compliance

3.1 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.]

3.2 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]

3.3 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

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

- 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;
- 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]

Performance Testing

- 3.5 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, at its option, may 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.
- 3.6 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.
- 3.7 Within 60 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

- 3.8 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]

Excess Emissions

- 3.9 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

- 3.10 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

3.11 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

3.12 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

3.13 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

3.14 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 58.01.01.211, 5/1/94]