



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

August 19, 2016

Keith Owings, Regional Manager
Noffsinger Manufacturing
500 Main Street
Filer, ID 83328

RE: Facility ID No. 083-00058, Noffsinger Manufacturing, Filer
Final Permit Letter

Dear Mr. Owings:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2015.0011 project 61486 to Noffsinger Manufacturing located at Filer for including the current operations and providing operational flexibility. 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 6, 2015.

This permit is effective immediately and replaces PTC No. P-050417, issued on June 9, 2006. This permit does not release Noffsinger Manufacturing 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 Bobby Dye, Regional Manager, at (208) 737-3889 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 Shawnee Chen at (208) 373-0502 or Shawnee.chen@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".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\SYC

Permit No. P-2015.0011 PROJ 61486

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Noffsinger Manufacturing
Permit Number P-2015.0011
Project ID 61486
Facility ID 083-00058
Facility Location 500 Main Street
Filer, ID 83328

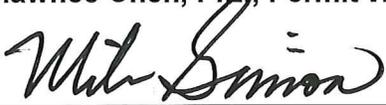
Permit Authority

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 August 19, 2016



Shawnee Chen, P.E., 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 include the facility's current operations and to provide operational flexibilities. [8/19/2016]
- 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 PTC No. P-050417, issued June 9, 2006. [8/19/2016]

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Source ID No.	Sources	Control Equipment
2	Hook Chain Process <u>Pre-heat oven for the hook line</u> Manufacturer: custom built Manufacture date: 1972 Date of modification: 2002 Heat input rating: 12.8 MMBtu/hr Max. production: 1,500 to 3,000 links per day Fuel: natural gas	None
2	Primer coating <u>Primer paint dip tank</u> Manufacturer: custom built Manufacture date: 1958 Max. capacity/size: 110 gallons Material: materials containing HAP/TAP	None
2, 3	Plastisol Process <u>Plastisol dip tank</u> Manufacturer: custom built Manufacture date: 1989 Max. capacity/size: 225 gal Material: materials containing VOC	None

Source ID No.	Sources	Control Equipment
2, 3	Plastisol Process <u>Electrically heated curing oven for curing plastisol cushion coating</u> Manufacturer: custom built Manufacture date: 1989 Max. capacity/size: 840 cubic feet	Smog Hog electrostatic precipitator (ESP) Manufacturer: United Air Specialist Model number: APC-22-1 Inlet flowrate: 2,000 acfm
2, 4	Rubber Molding Process <u>Spray Booth</u> Manufacturer: Spray Tech, Junair Model: 24'L, 14'W, 9'H Type: Side downdraft Manufacture date: 1999 <u>Spray Gun</u> Manufacturer: Central Pneumatic Model: 69708 Type: 32 oz. Siphon feed Rated Capacity: 10 cfm @ 60 psi <u>Spray Material</u> Spray adhesive: Chemlok 252x (containing HAP/TAP) Type of material coated: steel rod Max. usage: 1 gal/hr	<u>Filters for spray booth</u> Manufacturer: Chemco Model: 2020 100 DP Dimension: 20 inch x 20 inch x 2 inch 20 total filters PM control efficiency: 90% or greater
2	Rubber Glue-On Process <ul style="list-style-type: none"> • Cleaning with Xylene, a TAP/HAP • Squirt on Tuff Tac glue cement, containing a TAP • Extruded Rubber cure oven <ul style="list-style-type: none"> Manufacturer: custom built Manufacture date: 2005 Heat input rating: 500,000 Btu/hr Fuel: natural gas 	None
2	Finishing Coating <u>Diamond Vogel gloss black enamel dip tank</u> Manufacturer: custom built Manufacture date: 2005 Max. capacity/size: 576 gal Material: materials containing VOC, TAP, and HAP	None

[8/19/2016]

2 Facility-Wide Permit Conditions

2.1. Process Description

Noffsinger Manufacturing makes agricultural conveyor chains. The processes include hook chain and belt chain fabrication, primer coating, plastisol coating, rubber coating, and chain assembling and finishing coating. Air pollutants are emitted from the above processes.

[8/19/2016]

2.2. Control Device Descriptions

Particulate matter emissions from the electrically heated curing oven for curing plastisol cushion coating are controlled by a Smog Hog electrostatic precipitator. Particulate matter emissions from the spray booth are controlled by the spray booth filters. Application of Tuff Tac glue cement is performed in an enclosed building.

[8/19/2016]

Emission Limits

2.3. Opacity Limit

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.

[8/19/2016]

2.4. Hazardous Air Pollutants (HAP) Limits

- Emissions of any single HAP from the entire facility shall be less than 10 tons per year, based on any consecutive 12-calendar month period.
- Emissions of any combination of HAP from the entire facility shall be less than 25 tons per year, based on any consecutive 12-calendar month period.

[8/19/2016]

2.5. Volatile Organic Compounds (VOC) Limit

Emissions of VOC from the entire facility shall be less than 100 tons per year, based on any consecutive 12-calendar month period.

[8/19/2016]

2.6. Toxic Air Pollutants (TAP) Limit

For each modification, TAP increments shall not exceed the respective screening emissions levels (EL) as specified in IDAPA 58.01.01.585 and 586.

[8/19/2016]

Operating Requirements

2.7. Monthly Material Usage Limits and TAP Content Limits

For materials containing TAP and/or HAP, if the permittee chooses to only use the materials listed in Table 2.1, the permittee shall comply with the following:

- The materials usages shall not exceed the monthly material usages limits in Table 2.1.

- For Tuff Tac Glue Cement, Diamond Vogel Black Paint, Chemlok 252x Glue, and Lakeside Primer:
 - The materials shall only contain the respective TAP as listed in Table 2.1.
 - The TAP contents of materials, in lb/gal, shall not exceed the respective values as listed in Table 2.1.

Table 2.1. Usage Limits

Material	Monthly Limit (gal/month)	TAP Content (lb/gal) Limit (Material Density, lb/gal * TAP wt%)
Tuff Tac Glue Cement	450	Heptane: 5.95 lb/gal * 93% = 5.53 lb/gal Carbon Black: 5.95 lb/gal * 2% = 0.12 lb/gal
Xylene	3	NA
Diamond Vogel Black Paint	83	2-Butoxyethanol: 8.43 lb/gal * 20% = 1.69 lb/gal Sec-Butyl alcohol: 8.43 lb/gal * 5% = 0.42 lb/gal Carbon Black: 8.43 lb/gal * 0.591% = 0.05 lb/gal
Chemlok 252x Glue	24	Xylene: 7.9 lb/gal * 65% = 5.14 lb/gal Ethylbenzene: 7.9 lb/gal * 15% = 1.19 lb/gal Carbon Black: 7.9 lb/gal * 5% = 0.40 lb/gal
Lakeside Primer	45	2-Butanone or Methyl Ethyl Ketone: 7.36 lb/gal * 63% = 4.64 lb/gal Toluene: 7.36 lb/gal * 14% = 1.03 lb/gal Diacetone alcohol: 7.36 lb/gal * 5% = 0.37 lb/gal Cyclohexanone: 7.36 lb/gal * 4% = 0.29 lb/gal N-Butyl Alcohol or 1 Butanol: 7.36 lb/gal * 2% = 0.15 lb/gal Carbon Black: 7.36 lb/gal * 0.5% = 0.04 lb/gal
Methyl Ethyl Ketone	68	NA

[8/19/2016]

2.8. Emissions Control Requirements

Application of Tuff Tac glue cement for the rubber glue-on process shall be inside an enclosed building.

[8/19/2016]

2.9. The permittee shall keep all VOC product containers covered/closed when not in use.

[8/19/2016]

Monitoring and Recordkeeping Requirements

2.10. Material Usage and Information Monitoring

For each material used at the facility containing HAP, TAP, or VOC, the permittee shall record and maintain the following records:

- Monthly usage of the materials in gal/month
- Safety Data Sheets (SDS)

[8/19/2016]

2.11. Emissions Monitoring for Only Using the Materials Listed in Table 2.1

If the permittee only uses the materials listed in Table 2.1 and uses plastisol coating materials

with VOC content of 0.42 wt% or less, no additional monitoring is required except for the monitoring requirements in Material Usage and Information Monitoring Permit Condition.

[8/19/2016]

2.12. Emissions Monitoring for Using Materials Not Listed in Table 2.1

If the permittee uses materials other than what is listed in Table 2.1, by January 31 every year, the permittee shall notify DEQ when a new material(s) has been used in the year and submit SDS for the new material(s) and the following calculations, when applicable.

2.12.1 For HAP

If the permittee uses a material not being listed in Table 2.1 and containing a HAP, the permittee shall start monitoring HAP emissions as follows:

Each month, the permittee shall calculate monthly individual HAP emissions, monthly HAP emissions for all HAP combined, annual individual HAP emissions, and annual HAP emissions for all HAP combined to demonstrate compliance with the HAP limits Permit Condition.

2.12.2 For VOC

If the permittee uses a material not being listed in Table 2.1 and containing VOC or using the plastisol coating materials with VOC content greater than 0.42 wt%, the permittee shall start monitoring VOC emissions as follows:

Each month, the permittee shall calculate monthly VOC emissions and annual VOC emissions from the entire facility to demonstrate compliance with the VOC limit in the permit.

2.12.3 For TAP

If the permittee uses a material not being listed in Table 2.1 and containing a TAP, prior to using the material, the permittee shall calculate and determine the material usage limit so that the TAP emissions increments would not exceed the respective ELs.

[8/19/2016]

3 Vinyl Plastisol Chain Coating

3.1 Process Description

Primer coated chain links are pre-heated by an electrical induction heater, passed through a Plastisol liquid dip tank one at a time for one minute, and then followed by 15 to 18 minutes curing in an oven at temperatures of 300 to 425 °F. Individual links are assembled into a continuous pattern at room temperature and then transferred to storage.

3.2 Control Device Descriptions

Particulate emissions from the curing oven shall be controlled by an ESP.

3.3 Stack Specification

Table 3.1. Vinyl Plastisol Chain Coating Stack Specifications

Emissions Units / Processes	Control Devices	Emission Points
Electrically heated curing oven for curing plastisol cushion coating	Smog Hog electrostatic precipitator (ESP)	<p>The stack of the electrically heated Plastisol cushion coating curing oven shall meet the following specifications:</p> <p>Curing Oven Height: 18.5 feet Cross Sectional Area: 1.7 square feet Exit velocity: 2,650 feet per minutes Exit temperature 138 °F</p>

Emission Limits

3.4 Emission Limits

The particulate emissions from the stack of the electrically heated curing oven for curing plastisol cushion coating shall not exceed any corresponding emissions rate limits listed in Table 3.2.

No lead shall be emitted from the electrically heated curing oven for curing plastisol cushion coating.

Table 3.2. Vinyl Plastisol Chain Coating Emissions Limits

Source Description	PM	
	lb/hr ^(b)	T/yr ^(c)
Electrically heated Plastisol cushion coating curing oven	1.5	1.25

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- c Tons per any consecutive 12-calendar month period.

[8/19/2016]

Operating Requirements

3.5 Usage Limits

For vinyl plastisol chain coating process, no more than 94.2 pounds per hour or 75.8 tons per year of any coating material, or combination of coating materials, shall be processed.

3.6 Lead in Coating Materials

Any coating material or combination of coating materials used for vinyl plastisol chain coating process shall not contain lead as demonstrated by the SDS required in the Material Usage and Information Monitoring Permit Condition in the facility-wide permit conditions section.

[8/19/2016]

3.7 Operating ESP

The permittee shall use ESP to control particulate emissions from the curing oven. The ESP and its monitoring device(s) shall be operated in accordance with manufacturer specifications.

[8/19/2016]

Monitoring and Recordkeeping Requirements

3.8 Usage Monitoring

The permittee shall monitor and record the coating material usage monthly and add the monthly coating material usage to the previous consecutive 11-month coating material usage to demonstrate compliance with the Usage Limits Permit Condition. All records shall remain on-site in accordance with Monitoring and Recordkeeping requirements under General Provisions.

[8/19/2016]

3.9 Annual Inspection for ESP

At least once each calendar year, the permittee shall inspect the ESP for physical degradation that could affect the performance of the ESP. At a minimum, the permittee shall check the following components of the ESP for damage or other condition that would reduce the efficiency:

- Discharge electrodes
- Collection electrodes
- Electrode alignment
- Rapper mechanisms for the electrodes
- Transformer-rectifier sets

The permittee shall record in a log (an electronic log is acceptable) the results of the inspection. The log shall include, at a minimum, the date of inspection, the identity of the inspector, the results of each inspection, and the date of any repairs made or corrective action taken.

[8/19/2016]

4 Rubber Molding Process

4.1 Process Description

For rubber coated links, before applying Chemlok 252x adhesive, rods are cleaned in a soak tank containing Oakite 131 that consists of 30-60% inhibited phosphoric acid. The soak tank is cleaned every fall. Enprox 714 that consists of 40 -50% sodium hydroxide is used to neutralize the weakened phosphoric acid before its disposal. Chemlok 252x that binds steel to the rubber is sprayed to the cleaned rods in the paint booth. The links then go to an electrically heated rubber press to mold the rubber to the links.

[8/19/2016]

4.2 Control Device Descriptions

Particulate matter emissions from the spray booth are controlled by the spray booth filters.

Table 4.1 Spray Booth Description

Emissions Units / Processes	Control Devices
Spray booth	Spray booth filters

[8/19/2016]

Operating Requirements

4.3 Particulate matter emissions from the spray booth shall be controlled by the spray booth filters with a control efficiency of 90% or greater.

[8/19/2016]

4.4 The permittee shall operate the spray booth and spray booth filters in accordance with manufacturer's specifications.

[8/19/2016]

5 General Provisions

General Compliance

- 5.1 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, 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.]
- 5.2 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]
- 5.3 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

- 5.4 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, 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]

Construction and Operation Notification

- 5.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.
[IDAPA 58.01.01.211.02, 5/1/94]
- 5.6 The permittee shall furnish DEQ written notifications as follows:
- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
 - A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
 - 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; and

- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 5.7 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.
- 5.8 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.
- 5.9 Within 30 days, or up to 60 days when requested 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

- 5.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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 58.01.01.211, 5/1/94]

Excess Emissions

- 5.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

5.12 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

5.13 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

5.14 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

5.15 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

5.16 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]