

## **Statement of Basis**

**Permit to Construct No. P-2017.0002  
Project ID 61837**

**Classic Kitchens, Inc.  
Meridian, Idaho**

**Facility ID 001-00340**

**Final**

**April 26, 2017**  
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**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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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
Btu	British thermal units
CAS No.	Chemical Abstracts Service registry number
CE	Control Efficiency
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
gal/day	gallons per calendar day
gal/hr	gallons per hour
gal/yr	gallons per consecutive 12 calendar month period
gr	grain (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hr/yr	hours per year
HVLP	high volume, low pressure (applies to paint guns)
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/gal	pounds per gallon
lb/hr	pounds per hour
LPG	Liquefied Petroleum Gas
MMBtu	million British thermal units
MSDS	Material Safety Data Sheet
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/yr	tons per consecutive 12-calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TE	Transfer Efficiency
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

## FACILITY INFORMATION

### Description

Classic Kitchens, Inc. is a cabinet manufacturer located in Meridian Idaho. At this location doors, drawers, and molding for wooden cabinets and related items are painted in three enclosed spray booths with an HVLP paint gun. Heaters are electrically powered.

### Permitting History

This is the initial PTC for a new facility thus there is no permitting history.

### Application Scope

This permit is the initial PTC for this facility.

### Application Chronology

January 17, 2017	DEQ received an application and an application fee.
January 23 – February 7, 2017	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
January 27, 2017	DEQ determined that the application was complete.
February 15, 2017	DEQ made available the draft permit and statement of basis for peer and regional office review.
February 24, 2017	DEQ made available the draft permit and statement of basis for applicant review.
April 24, 2017	DEQ received the permit processing fee.
April 26, 2017	DEQ issued the final permit and statement of basis.

## TECHNICAL ANALYSIS

### Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source Description	Control Equipment Description	Emissions Point ID No. and Description
<p><b>Paint Booth: PB1</b>                      Manufacturer – Col-Met EFS                      Model: EIB-14-07-07-00-S                      Construction Date: 2016                      Filter, Control Efficiency: 98.0% or greater</p> <p><b>Paint Booth: PB2</b>                      Manufacturer: Col-Met EFS                      Model: EIB-14-07-07-00-S                      Construction Date: 2016                      Filter, Control Efficiency: 98.0% or greater</p> <p><b>Paint Booth: PB3</b>                      Manufacturer – Col-Met EFS                      Model: EIB-14-07-07-00-S                      Construction Date: 2016                      Filter, Control Efficiency: 98.0% or greater</p>	<p><b>Paint Booth filter media</b>                      Manufacturer – C.A. Technologies                      Model: Fiberglass 91-131                      Filter, Control Efficiency: 98.0% or greater</p> <p><b>Spray Guns:</b>                      Manufacturer: C. A. Technologies                      Model: Cougar                      Type: Airless HVLP                      Transfer Efficiency: &gt;40%                      Limit on the Type and Volume of Material Usage</p>	<p>Paint booth exhaust stack</p>

## ***Emissions Inventories***

### **Potential to Emit**

IDAPA 58.01.01 defines Potential to Emit as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the cabinet coating operations at the facility (see Appendix A) associated with this proposed project. Emissions estimates of criteria pollutant, HAP PTE were based on emission MSDS documentation and continuous operation.

### **Uncontrolled Potential to Emit**

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a “Synthetic Minor” source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for regulated air pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this cabinet coating operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8760 hr/yr.

**Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	Lead (Pb)
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Spray Booths B1, B2, B3	20.39	0.00	0.00	0.00	52.28	0.00
<b>Total</b>	<b>20.39</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>52.28</b>	<b>0.00</b>

The following table presents the uncontrolled Potential to Emit for HAP pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. For this cabinet coating operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8760 hr/yr.

**Table 3 UNCONTROLLED POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS**

Hazardous Air Pollutants	PTE (T/yr)
Ethylbenzene	0.0042
Formaldehyde	0.0022
MIBK	0.0922
Toluene	0.6083
<b>Total</b>	<b>0.71</b>

### **Pre-Project Potential to Emit**

This is an existing facility. However, since this is the first time the facility is receiving a permit, pre-project emissions are set to zero for all criteria pollutants.

**Post Project Potential to Emit**

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility’s classification as a result of this project. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria pollutants from all emissions units at the facility as provided by applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

**Table 4 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>
Spray Booths B1, B2, B3	0.032	0.093	0.00	0.00	0.00	0.00	0.00	0.00	4.12	11.94
<b>Post Project Totals</b>	<b>0.03</b>	<b>0.09</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>4.12</b>	<b>11.94</b>

- a) Controlled average emission rate in pounds per hour is a daily average, based on the proposed daily operating schedule and daily limits.
- b) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

**Change in Potential to Emit**

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

**Table 5 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Post Project Potential to Emit	0.03	0.09	0.00	0.00	0.00	0.00	0.00	0.00	4.12	11.94
<b>Changes in Potential to Emit</b>	<b>0.03</b>	<b>0.09</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>4.12</b>	<b>11.94</b>

**TAP Emissions**

A summary of the estimated PTE for emissions increase of toxic air pollutants (TAP) is provided in the following table.

**Table 6 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR TOXIC AIR POLLUTANTS**

Toxic Air Pollutants	Pre-Project Emissions Rates for Units at the Facility (lb/hr)	Post Project Emissions Rates for Units at the Facility (lb/hr)	Change in Emissions Rates for Units at the Facility (lb/hr)	Screening Emission Level (lb/hr)	Exceeds Screening Level? (Yes/No)
Formaldehyde	0.000	0.00050	0.00050	0.00051	No
Ethanol	0.000	0.665	0.665	125	No
2-Propanol	0.000	0.295	0.295	65.3	No
Acetone	0.000	0.773	0.773	119	No
1-Butanol	0.000	0.232	0.232	10	No
Isobutyl Alcohol	0.000	0.108	0.108	10	No
Ethylbenzene	0.000	0.001	0.001	29	No
Methyl Isobutyl Ketone	0.000	0.030	0.030	13.7	No
1-Methoxy-2-Propanol Acetate	0.000	0.056	0.056	24	No
Toluene	0.000	0.195	0.195	25	No
Isobutyl Acetate	0.000	0.044	0.044	46.7	No
2-Butoxyethanol	0.000	0.006	0.006	8	No
n-Butyl Acetate	0.000	1.625	1.625	47.3	No
Ethyl Acetate	0.000	0.150	0.150	93.3	No

Toxic Air Pollutants	Pre-Project Emissions Rates for Units at the Facility (lb/hr)	Post Project Emissions Rates for Units at the Facility (lb/hr)	Change in Emissions Rates for Units at the Facility (lb/hr)	Screening Emission Level (lb/hr)	Exceeds Screening Level? (Yes/No)
Amorphous Precipitated Silica	0.000	0.005	0.005	0.667	No

None of the screening emission levels for TAP were exceeded as a result of this project. Therefore, modeling is not required for any TAP because none of the 24-hour average non-carcinogenic screening ELs identified in IDAPA 58.01.01.585, or the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586, were exceeded.

### **Ambient Air Quality Impact Analyses**

DEQ’s modeling guidance includes that if criteria air pollutant emissions are below regulatory concern (less than 10% of what is defined as significant) then modeling of those pollutants is not required. Since no other criteria pollutant exceeds 10% of what is defined as significant modeling is not required for criteria pollutant.

Emissions inventory for TAPs as presented by the applicant, and shown above in Table 6 show all TAPs to be under the emission screening levels (EL) for the proposed usage. Additionally, permit conditions 2.11 through 2.13 regulate TAPs such that if alternative coatings are used. If any of the EL are exceeded, modeling will be required to meet the ambient air concentrations. If any EL is exceeded in daily monitoring, Permit conditions 2.13 and 2.14 requires the owner/operator to perform modeling, keep it on record on site, and submit it to the department on an annual basis.

## **REGULATORY ANALYSIS**

### **Attainment Designation (40 CFR 81.313)**

The facility is located in Ada County, which is designated as attainment or unclassifiable for PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

### **Facility Classification**

The AIRS/AFS facility classification codes are as follows:

For THAPs (Total Hazardous Air Pollutants) Only:

- A = Use when any one HAP has actual or potential emissions  $\geq 10$  T/yr or if the aggregate of all HAPS (Total HAPS) has actual or potential emissions  $\geq 25$  T/yr.
- SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits  $\geq 8$  T/yr of a single HAP or  $\geq 20$  T/yr of THAP.
- SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to  $< 8$  T/yr of a single HAP and/or  $< 20$  T/yr of THAP.
- B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold
- UNK = Class is unknown

For All Other Pollutants:

- A = Actual or potential emissions of a pollutant are  $\geq 100$  T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are  $\geq 80$  T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the

pollutant are < 80 T/yr.

B = Actual and potential emissions are < 100 T/yr without permit restrictions.

UNK = Class is unknown.

**Table 74 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION**

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	20.39	0.01	100	B
PM <sub>10</sub>	20.39	0.01	100	B
PM <sub>2.5</sub>	20.39	0.01	100	B
SO <sub>2</sub>	0.00	0.00	100	B
NO <sub>x</sub>	0.00	0.00	100	B
CO	0.00	0.00	100	B
VOC	52.28	11.94	100	B
HAP (single)	0.61	0.61	10	B
HAP (total)	0.71	0.71	25	B
Pb	0.00	0.00	100	B

**Permit to Construct (IDAPA 58.01.01.201)**

IDAPA 58.01.01.201 ..... Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the existing emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

**Tier II Operating Permit (IDAPA 58.01.01.401)**

IDAPA 58.01.01.401 ..... Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

**Visible Emissions (IDAPA 58.01.01.625)**

IDAPA 58.01.01.625 ..... Visible Emissions

The sources of PM emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 2.6.

**Particulate Matter – New Equipment Process Weight Limitations (IDAPA 58.01.01.701)**

IDAPA 58.01.01.701 ..... Particulate Matter – New Equipment Process Weight Limitations

IDAPA 58.01.01.700 through 703 set PM emission limits for process equipment based on when the piece of equipment commenced operation and the piece of equipment’s process weight (PW) in pounds per hour (lb/hr). IDAPA 58.01.01.701 and IDAPA 58.01.01.702 establish PM emission limits for equipment that commenced operation on or after October 1, 1979 and for equipment operating prior to October 1, 1979, respectively.

In accordance with IDAPA 58.01.01.701.01.a (for units starting up after October 1, 1979):

$$\text{Allowable Particulate Emissions, } E = 0.045(\text{PW})^{0.60}$$

The minimum Process Weight that will demonstrate compliance can be calculated:

$$E_{\text{actual}} = 0.0931 \text{ lbs./hr. particulate} = 0.045(\text{PW}_{\text{minimum}})^{0.60}$$

Minimum PW = 3.4 lbs./hr.

Process Weight includes the weight of all material entering the source. In CKDI’s case, process weight includes the weight of the wood coated and the weight of the coatings and solvents. The weight of these materials easily

exceeds the compliance minimum of 3.4 lbs./hr. Therefore, the facility meets the standards listed in IDAPA 58.01.01.701.

**Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)**

IDAPA 58.01.01.301 .....Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

**PSD Classification (40 CFR 52.21)**

40 CFR 52.21 .....Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

**NSPS Applicability (40 CFR 60)**

The facility is not subject to any NSPS requirements 40 CFR Part 60.

**NESHAP Applicability (40 CFR 61)**

The proposed source is not an affected source subject to NESHAP in 40 CFR 61, and this permitting action does not alter the applicability status of existing affected sources at the facility.

**MACT Applicability (40 CFR 63)**

The facility is not subject to any MACT standards in 40 CFR Part 63 as described below:

**CFR Part 63, Subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations §63.800 Applicability.**

*(a) The affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR part 63, subpart A, §63.2.*

This NESHAP only applies to operations on the site of a major source. CLASSIC KITCHENS, INC. is not a major source so this NESHAP does not apply to this project.

**CFR Part 63, Subpart MMMM — National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products**

*§63.3881 Am I subject to this subpart?*

*(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.3882, that uses 946 liters (250 gallons (gal)) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products defined in paragraph (a) of this section; and that is a major source, is located at a major source, or is part of a major source of emissions of HAP.*

This NESHAP only applies to operations on the site of a major source. CLASSIC KITCHENS, INC. is not a major source and is not a major source of HAP.

**CFR Part 63, Subpart NNNN — National Emission Standards for Hazardous Air Pollutants: Surface Coating of Large Appliances**

*§63.4081 Am I subject to this subpart?*

*(a) You are subject to this subpart if you own or operate a facility that applies coatings to large appliance parts or products, and is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP), except as provided in paragraph (d) of this section.*

Classic Kitchens, Inc. does not believe that doors and door frames meet the definition of “large appliance” as stated in §63.4181, nor is CLASSIC KITCHENS, INC. a major source of HAP.

**40 CFR Part 63, Subpart QQQQ — National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products**

*§63.4681 Am I subject to this subpart?*

*(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source, as defined in §63.4682, that uses 4,170 liters (1,100 gallons) per year, or more, of coatings in the source category defined in paragraph (a) of this section and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP).*

This NESHAP only applies to operations on the site of a major source. Classic Kitchens, Inc. is not a major source of HAP.

**40 CFR Part 63, Subpart RRRR — National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture**

*§63.4881 Am I subject to this subpart?*

*(b) You are subject to this subpart if you own or operate a new, reconstructed, or existing affected source as defined in §63.4882, in the source category defined in paragraph (a) of this section, and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP).*

This NESHAP only applies to operations coating metal furniture and on the site of a major source. Classic Kitchens, Inc. does not coat metal furniture and is not a major source of HAP.

**CFR Part 63, Subpart HHHHHH — National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources**

*§63.11170 Am I subject to this subpart?*

*(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:*

*(1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.*

*(2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment...*

*(3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product...*

Classic Kitchens, Inc. does not use MeCl to remove paint nor do they spray coatings on motor vehicles or motor equipment. Classic Kitchens, Inc. coatings do not contain any of the target HAP (Cr, Pb, Mn, Ni, and Cd, as defined in §63.11180). Therefore, this NESHAP does not apply to Classic Kitchens, Inc.'s operations.

### ***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.

#### ***Initial Permit Condition 1.1 to 2.2***

These introductory permit conditions describe the scope, emission sources, control devices and description of the cabinet coating process.

#### ***Initial Permit Condition 2.3***

Coating Material Use Limit by gallons of specific individual materials was included at the request of the applicant. The potential use of future alternate coatings would be allowed if the amounts and types of alternate coatings qualify for exemption (IDAPA 58.01.01.2220-223) or would exhibit emissions that do not exceed 585 or 586 TAP ELs.

#### ***Initial Permit Condition 2.6 and 2.7***

These permit conditions re-iterate the IDAPA 58.01.01.625 and 58.01.01.776 regarding visible emissions and odors.

#### ***Initial Permit Condition 2.8***

This permit condition requires HVLP or equivalent spray guns be used and the filter systems to be operated at all times and in accordance with manufacturer's specifications when paint spray booths are operated. The particulate filtration efficiency and the coating transfer efficiency for this control equipment were used in developing the particulate emissions and were relied upon to demonstrate preconstruction compliance with BRC levels for PM<sub>10</sub>.

#### ***Initial Permit Condition 2.9***

This permit condition requires recordkeeping and monitoring for complaints of odors, including corrective actions.

#### ***Initial Permit Condition 2.10***

Using the purchase records, SDSs, and material usage records, the permittee shall monitor and record the weekly use amounts of specified coatings to demonstrate compliance with Permit Table 2.2 limits.

#### ***Initial Permit Condition 2.11***

In addition, the permittee shall develop records demonstrating that possible future alternate coatings are either exempt from permitting requirements (IDAPA 58.01.01.2220-223) or the maximum amounts that do not exceed 585 or 586 TAP ELs and record the amounts of alternate coatings used. Formulae to use to calculate the maximum amounts are listed in the Permit. For volatile non-carcinogenic TAP; the allowable gallons per day daily emissions (pounds per calendar day) is the TAP screening emissions multiplied by 24; for solid TAPs, the application and filtering are taken into account. For volatile carcinogenic TAPs, allowable gallons per month monthly emissions (pounds per consecutive 12-month period) is the screening emissions multiplied by 8760; for solid carcinogenic TAPs, the application and filtering are taken into account.

#### ***Initial Permit Condition 2.12***

Monitoring alternative coating by gallons per week, the emissions for non-carcinogenic and carcinogenic TAPs shall use the equations from Permit Condition 2.11 by dividing the gallons per week by the number of operating days.

#### ***Initial Permit Condition 2.13***

This requires a modeling demonstration anytime a respective TAP EL is exceeded and will require the permittee to have SDS or MSDS available on site for each TAP containing material. If a range is listed for the TAP, the highest value of the range is to be used for worst case. In accordance with the general provisions all emissions calculations shall remain on-site.

#### ***Initial Permit Condition 2.14***

This reporting condition was added to report to DEQ each year on all required modeling performed due to TAPs exceedances as stated in permit conditions 2.11 and 2.12.

### **General Provision Permit Conditions**

#### Initial Permit Condition 3.1

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

#### Initial Permit Condition 3.2

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

#### Initial Permit Condition 3.3

The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

#### Initial Permit Condition 3.4

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

#### Initial Permit Condition 3.5

The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

#### Initial Permit Condition 3.6

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

#### Initial Permit Condition 3.7

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

#### Initial Permit Condition 3.8

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

#### Initial Permit Condition 3.9

The performance test report provision requires that the permittee report any performance test results to DEQ within 60 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

#### Initial Permit Condition 3.10

The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

#### Initial Permit Condition 3.11

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

#### Initial Permit Condition 3.12

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

Initial Permit Condition 3.13

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

Initial Permit Condition 3.14

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

Initial Permit Condition 3.15

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

Initial Permit Condition 3.16

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

**PUBLIC REVIEW**

***Public Comment Opportunity***

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

## **APPENDIX A – EMISSIONS INVENTORIES**

Table 2-1: Paint Use and Paint Composition Summary

PTE MAX Daily Use (gal/day)	PTE Annual Use (gal./year)	Manufacturer	Coating Material (See Notes) <sup>1</sup>	Density	Solids	VOC (non-exempt)	Formaldehyde S86 TAP	Ethanol	2-Propanol	Acetone	1-Butanol	Isobutyl Alcohol	Methyl Isobutyl Ketone	Ethylbenzene	1-Methoxy 2-Propyl Acetate	Toluene	
				lbs./gal.			50-00-0	64-17-5	67-63-0	67-64-1	71-36-3	78-83-1	108-10-1	100-41-4	108-65-6	108-88-3	
2.50	600	Campbell	MagnaMax Precatalyzed Pigmented Lacquer W29712	8.60	41.9%	57.6%	0.02%	8.0%	7.0%	3.0%	6.0%	1.0%			3.0%		
8.28	1986	Campbell	High Performance WW Pre-Cat Clear Lacquer MC12242	7.79	30.0%	69.8%	0.02%	17.0%	4.0%		4.0%	1.0%					
4.08	978	Campbell	Quick Dry Vinyl Sealer C10189	7.30	22.5%	61.6%		4.0%	3.0%	52.0%	1.0%	3.0%					
3.68	882	Campbell	MagnaClaw White Pre-Cat Primer/Undercoater W115749	9.52	51.4%	45.9%	0.02%	6.0%	6.0%	7.0%	4.0%	1.0%		0.1%	2.0%		
1.00	260	Campbell	Standard Lacquer Thinner C16036	7.09	0.0%	100.0%						7.0%	10.0%			65.0%	
19.53	4706																
Component Characteristics				If volatile, enter "1" ==>				1	1	1	1	1	1	1	1	1	1
Hourly Spray Calculations (lbs./hr.)  (Based on 24-hr averaging period, except S86 TAPs based on annual average, see sample calc below)	Maker	Coating Material	Density	Solids	VOC (non-exempt)	Formaldehyde S86 TAP	Ethanol	2-Propanol	Acetone	1-Butanol	Isobutyl Alcohol	Methyl Isobutyl Ketone	Ethylbenzene	1-Methoxy 2-Propyl Acetate	Toluene		
			lbs./gal.														
	Campbell	MagnaMax Precatalyzed Pigmented Lacquer W29712	8.60	0.38	0.52	0.0001	0.07	0.06	0.03	0.05	0.01	0.0000	0.0000	0.03	0.00		
	Campbell	High Performance WW Pre-Cat Clear Lacquer MC12242	7.79	0.81	1.88	0.0003	0.46	0.11	0.00	0.11	0.03	0.0000	0.0000	0.00	0.00		
	Campbell	Quick Dry Vinyl Sealer C10189	7.30	0.76	0.76	0.0000	0.05	0.04	0.84	0.01	0.04	0.0000	0.0000	0.00	0.00		
	Campbell	MagnaClaw White Pre-Cat Primer/Undercoater W115749	9.52	0.75	0.67	0.0001	0.09	0.09	0.10	0.06	0.01	0.0000	0.0015	0.03	0.00		
	Campbell	Standard Lacquer Thinner C16036	7.09	0.00	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.02	0.0295	0.0000	0.00	0.19	
	0	0	0														
	0	0	0														
	0	0	0														
	0	0	0														
	0	0	0														
0	0	0															
Spray Total (lb/hr)					2.89	4.12	0.0005	0.87	0.29	0.77	0.23	0.11	0.0295	0.0015	0.06	0.19	
Annual Spray Calculations (tons/yr.)  (See sample calc below)	Maker	Coating Material	Density	Solids	VOC (non-exempt)	Formaldehyde S86 TAP	Ethanol	2-Propanol	Acetone	1-Butanol	Isobutyl Alcohol	Methyl Isobutyl Ketone	Ethylbenzene	1-Methoxy 2-Propyl Acetate	Toluene		
			lbs./gal.	tons/yr.													
	Campbell	MagnaMax Precatalyzed Pigmented Lacquer W29712	8.60	1.08	1.49	0.00	0.21	0.18	0.08	0.15	0.03	0.00	0.00	0.08	0.00		
	Campbell	High Performance WW Pre-Cat Clear Lacquer MC12242	7.79	2.32	5.40	0.00	1.32	0.31	0.00	0.31	0.08	0.00	0.00	0.00	0.00		
	Campbell	Quick Dry Vinyl Sealer C10189	7.30	2.20	2.20	0.00	0.14	0.11	1.86	0.04	0.11	0.00	0.00	0.00	0.00		
	Campbell	MagnaClaw White Pre-Cat Primer/Undercoater W115749	9.52	2.16	1.93	0.00	0.25	0.25	0.29	0.17	0.04	0.00	0.00	0.08	0.00		
	Campbell	Standard Lacquer Thinner C16036	7.09	0.00	0.92	0.00	0.00	0.00	0.00	0.00	0.06	0.09	0.00	0.00	0.61		
	0	0	0														
	0	0	0														
	0	0	0														
	0	0	0														
	0	0	0														
0	0	0															
Spray Total (tons/yr.)					7.78	11.94	0.00	1.92	0.85	2.23	0.67	0.32	0.09	0.00	0.16	0.61	

1. Chemical composition from MSDS % composition values except formaldehyde. MSDS indicates formaldehyde-based resin may release formaldehyde under certain conditions of use. Manufacturer reports % composition is conservative maximum for MSDS reporting purposes and amount potentially releasable under high humidity conditions is very small. (Personal communication Teresa, M.L. Campbell Co., 216-566-2902, to Mark Torf, TORF Environmental Management., October 27, 2016.) Conservative 15% factor applied to % composition value to estimate potential emission.

Table 2-1: Paint Use and Paint Composition Summary

PTE MAX, Daily Use (gal/day)	PTE Annual Use (gal/year)	Manufacturer	Coating Material (See Notes) <sup>1</sup>	Isobutyl Acetate	Methyl n-amyl ketone	2-Butoxyethanol	Butyl Acetate	Ethyl Acetate	Titanium Dioxide Not TAP	Talc Not TAP	Amorphous Precipitated Silica
				110-19-0	110-43-0	111-76-2	123-86-4	141-78-6	13463-67-7	14807-96-6	112926-00-8
2.50	600	Campbell	MagnaMax Precatalyzed Pigmented Lacquer W29712				20.0%	7.0%	11.0%		1.0%
8.28	1986	Campbell	High Performance WW Pre-Cat Clear Lacquer MC12242				43.0%				
4.08	978	Campbell	Quick Dry Vinyl Sealer C10189		8.0%		7.0%				
3.68	882	Campbell	MagnaClaw White Pre-Cat Primer/Undercoater W115749				14.0%	6.0%	5.0%	11.0%	
1.00	260	Campbell	Standard Lacquer Thinner C16036	15.0%		2.0%					
19.53	4706										
Component Characteristics				If volatile, enter "1" ==>							
				1	1	1	1	1		1	1
Hourly Spray Calculations (lbs./hr.)  (Based on 24-hr averaging period, except 586 TAPs based on annual average, see sample calc below)	Maker	Coating Material	Isobutyl Acetate	Methyl n-amyl ketone	2-Butoxyethanol	Butyl Acetate	tert-Butyl acetate	Titanium Dioxide Not TAP	Talc Not TAP	Amorphous Precipitated Silica	
	Campbell	MagnaMax Precatalyzed Pigmented Lacquer W297	0.00	0.00	0.00	0.18	0.06	0.10	0.00	0.009	
	Campbell	High Performance WW Pre-Cat Clear Lacquer MC122	0.00	0.00	0.00	1.15	0.00	0.00	0.00	0.000	
	Campbell	Quick Dry Vinyl Sealer C10189	0.00	0.10	0.00	0.09	0.00	0.00	0.00	0.000	
	Campbell	MagnaClaw White Pre-Cat Primer/Undercoater W115	0.00	0.00	0.00	0.20	0.09	0.07	0.16	0.000	
	Campbell	Standard Lacquer Thinner C16036	0.04	0.00	0.01	0.00	0.00	0.00	0.00	0.00	
	0	0	0								
	0	0	0								
	0	0	0								
	0	0	0								
	0	0	0								
	0	0	0								
	0	0	0								
	Spray Total (lb/hr)		0.04	0.10	0.01	1.62	0.15	0.17	0.16	0.009	
Annual Spray Calculations (tons/yr.)  (See sample calc below)	Maker	Coating Material	Isobutyl Acetate	Methyl n-amyl ketone	2-Butoxyethanol	Butyl Acetate	tert-Butyl acetate	Titanium Dioxide Not TAP	Talc Not TAP	Amorphous Precipitated Silica	
	Campbell	MagnaMax Precatalyzed Pigmented Lacquer W297	0.00	0.00	0.00	0.52	0.18	0.28	0.00	0.03	
	Campbell	High Performance WW Pre-Cat Clear Lacquer MC122	0.00	0.00	0.00	3.33	0.00	0.00	0.00	0.00	
	Campbell	Quick Dry Vinyl Sealer C10189	0.00	0.29	0.00	0.25	0.00	0.00	0.00	0.00	
	Campbell	MagnaClaw White Pre-Cat Primer/Undercoater W115	0.00	0.00	0.00	0.59	0.25	0.21	0.46	0.00	
	Campbell	Standard Lacquer Thinner C16036	0.14	0.00	0.02	0.00	0.00	0.00	0.00	0.00	
	0	0	0								
	0	0	0								
	0	0	0								
	0	0	0								
	0	0	0								
	0	0	0								
		Spray Total (tons/yr.)		0.14	0.29	0.02	4.68	0.43	0.49	0.46	0.03

1. Chemical composition from MSDS % composition values except formaldehyde. MSDS indicates formaldehyde reports % composition is conservative maximum for MSDS reporting purposes and amount (Personal communication Teresa, M.L. Campbell Co., 216-866-2902, to Mark Torf, TORF Environmental Conservativa 15% factor applied to % composition value to estimate potential emission.

Table 2-1: Paint Use and Paint Composition Summary

HAP/TAP/Solids Example Calculation:		
Ethanol HOURLY SPRAY RATE (24-hr Average)	Max Hourly ethanol in Pigmented Lacquer	= 2.5 gal/day * 8.6 lb/gal density * 8.0 wt% ethanol in Pigmented Lacquer * 1 day/24 hrs = 0.07 lb/hr ethanol in Pigmented Lacquer
	Max Hourly ethanol in other products, if present, is calculated in a similar manner. Spray Total ethanol is calculated by adding all Campbell ethanol.	
	Ethanol Hourly Spray Total	= 0.07 lb/hr ethanol in Pigmented Lacquer + 0.60 lb/hr ethanol in other products = 0.67 lb/hr ethanol in all products
Ethanol ANNUAL SPRAY RATE	Max 12-mo ethanol in Pigmented Lacquer	= 600 gal/yr Pigmented Lacquer * 8.6 lb/gal density * 8.0 wt% ethanol in Pigmented Lacquer * 1 ton/2000 lbs = 0.2 tons/yr ethanol in Pigmented Lacquer
	Max 12-mo ethanol in other products, if present, is calculated in a similar manner. Spray Total ethanol is calculated by adding all Campbell ethanol	
	Ethanol Annual Spray Total	= 0.2 tons/yr ethanol in Pigmented Lacquer + 1.71 tons/yr ethanol in other products = 1.92 tons/yr ethanol in all products
Solids that can be emitted as particulates are present in several Campbell products		
Particulate HOURLY SPRAY RATE (24-hr Average)	Max Hourly solids in Pigmented Lacquer	= 2.5 gal/day * 8.6 lb/gal density * 41.9 wt% solids in Pigmented Lacquer * 1 day/24 hrs = 0.38 lb/hr solids in Pigmented Lacquer
	Max Hourly solids in other products is calculated in a similar manner. Spray Total Particulate Matter is calculated by adding all Campbell Particulate Matter.	
	Solids Hourly Spray Total	= 0.38 lb/hr solids in Pigmented Lacquer + 2.32 lb/hr solids in other products = 2.69 lb/hr solids in all products
Particulate ANNUAL SPRAY RATE	Max 12-mo solids	= 600 gal/yr Pigmented Lacquer * 8.6 lb/gal density * 41.9 wt% solids in Pigmented Lacquer * 1 ton/2000 lbs = 1.08 tons/yr solids in Pigmented Lacquer
	Max 12-mo solids in other products is calculated in a similar manner. Spray Total solids is calculated by adding all Campbell solids.	
	Solids Annual Spray Total	= 1.08 tons/yr solids in Pigmented Lacquer + 6.68 tons/yr solids in other products = 7.76 tons/yr solids in all products

Table 2-2 Paint Spray Booth Emissions Summary

Toxic Air Pollutants	CAS	Maximum Spray Rate <sup>1</sup> (lb/hr)	Spray Retention Rate <sup>2</sup> (%)	Potential to Emit (lb/hr)	Paint Filter Efficiency <sup>3,4</sup> (%)	Controlled Emission Rate (lb/hr)
Formaldehyde	50-00-0	0.000	0%	0.00050	0%	0.000
Ethanol	64-17-5	0.665	0%	0.665	0%	0.665
2-Propanol	67-63-0	0.295	0%	0.295	0%	0.295
Acetone	67-64-1	0.773	0%	0.773	0%	0.773
1-Butanol	71-36-3	0.232	0%	0.232	0%	0.232
Isobutyl Alcohol	78-83-1	0.108	0%	0.108	0%	0.108
Ethylbenzene	100-41-4	0.001	0%	0.001	0%	0.001
Methyl Isobutyl Ketone	108-10-1	0.030	0%	0.030	0%	0.030
1-Methoxy-2-Propanol Acetate	108-65-6	0.056	0%	0.056	0%	0.056
Toluene	108-88-3	0.195	0%	0.195	0%	0.195
Isobutyl Acetate	110-19-0	0.044	0%	0.044	0%	0.044
2-Butoxyethanol	111-76-2	0.006	0%	0.006	0%	0.006
n-Butyl Acetate	123-86-4	1.625	0%	1.625	0%	1.625
Ethyl Acetate	141-78-6	0.150	0%	0.150	0%	0.150
Amorphous Precipitated Silica	112926-00-8	0.009	40%	0.005	98%	0.0001

Criteria Air Pollutants	Maximum Spray Rate <sup>1</sup>		Spray Retention Rate <sup>2</sup> (%)	Potential to Emit		Paint Filter Efficiency <sup>3</sup> (%)	Controlled Emissions	
	lb/hr	ton/yr		lb/hr	ton/yr		lb/hr	ton/yr
PM <sub>10</sub>	2.69	7.76	40%	1.62	4.66	98.0%	0.032	0.093
PM <sub>2.5</sub>	2.69	7.76	40%	1.62	4.66	98.0%	0.032	0.093
VOC	4.12	11.94	0%	4.12	11.94	0%	4.12	11.94

Hazardous Air Pollutants (HAP)	CAS	Maximum Spray Rate <sup>1</sup> (ton/yr)	Spray Retention Rate (%)	Paint Filter Efficiency <sup>3</sup>	Potential to Emit (ton/yr)
Ethylbenzene	100-41-4	0.0042	0%	0%	0.0042
Formaldehyde	50-00-0	0.0022	0%	0%	0.0022

Notes:

1. The maximum hourly or annual Spray Total of the coatings.
2. Non-volatile emissions are calculated using a coating retention rate of 40% for the C.A. Technologies Air Assisted Airless spray gun, based on Transfer Efficiency and VOC Emissions of Spray Gun and Coating Technologies in Wood Finishing, Pacific North Pollution Prevention Research Center, Lesley Snowden-Swan, Battelle Pacific Northwest Laboratories, 1992.
3. C.A. Technologies General Purpose Industrial Fiberglass Filter 98.7% (24) 20X20 inch blanket filters at each spray booth for paint or A conservative efficiency rating 98% is used in the emission estimates.
4. Control filter efficiency set to 0.0 in order to compare uncontrolled emission rates to TAP Level I exemption screening levels, IDAPA.

## APPENDIX B – FACILITY DRAFT COMMENTS

### **The following comments were received from the facility on March 3, 2017:**

**Facility Comment:** (A1) While the Form EU-3 and the filter specification sheet indicate that the filter is rated to 98.7% efficiency, the emissions calculations are slightly more conservative and apply 98.0% efficiency. In order to allow potential future filter substitution with a filter rated to 98.0%, we suggest that the permit reference a filter efficiency of 98.0% rather than 98.7% in all sections. (A2)

**DEQ Response:** Since these were demonstrated in the EI submitted by the applicant, the changes will be included in the final permit

**Facility Comment:** Comments A3 through A5 are related to the justification of TAPs tracking and monitoring since, with the exception of formaldehyde, emissions of the specified types and amounts of Table 2.2 coatings have already been shown to exhibit less than 5% of the 585 TAP ELs.

**DEQ Response:** Since the more restrictive EL screening value for formaldehyde is the 586 annual average, the suggested language will be used in place of the original daily TAPs calculation.

**Facility Comment:** (A6) The requirement to record “frequency of changes” seems to offer little benefit when there is no recommended “frequency of change” and when there will be a record documenting when the filter is changed. Unless there is a compelling reason for this recordkeeping element we request that this element be eliminated.

**DEQ Response:** This requirement ensures that the emissions submitted with the application are maintained by the rated standards applied for. To alleviate confusion about the frequency of changes, a permit condition for developing an O&M manual has been added. This will, by necessity, contain the frequency or condition when filters are to be changed to maintain clean operating equipment.

**Facility Comment:** Comments A7 through A11 are related to the changes made to the TAPs tracking and monitoring presented in comments A3 through A5. There is also suggested calculation reformatting.

**DEQ Response:** See the response to comments A3 through A5. The weekly monitoring will replace the daily monitor for the same reasons and the calculation reformatting suggestions will be incorporated.

**APPENDIX C – PROCESSING FEE**

## PTC Fee Calculation

**Instructions:**

Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company: **Classic Kitchens, Inc.**  
 Address: **1170 Taylor Avenue, Suite 120**  
 City: **Meridian**  
 State: **ID**  
 Zip Code: **83642**  
 Facility Contact: **Bret Jones**  
 Title: **Owner**  
 AIRS No.: **001-00340**

- N** Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
- Y** Did this permit require engineering analysis? Y/N
- N** Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

<b>Emissions Inventory</b>			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO <sub>x</sub>	0.0	0	0.0
SO <sub>2</sub>	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	11.9	0	11.9
TAPS/HAPS	0.7	0	0.7
Total:	12.7	0	<b>12.7</b>
Fee Due	<b>\$ 5,000.00</b>		

Comments: