Statement of Basis

Tier I Operating Permit No. T1-2017.0040
Project ID 61916

Spunstrand Inc
Wallace, Idaho

Facility ID 079-00038

Final

March 22, 2018
Tom Burnham TB
Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent emissions
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
HAP	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NSPS	New Source Performance Standards
O&M	operation and maintenance
O_2	oxygen
PC	permit condition
PM	particulate matter
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
RICE	reciprocating internal combustion engines
Rules	*Rules for the Control of Air Pollution in Idaho*
SIP	State Implementation Plan
SO_2	sulfur dioxide
T/yr	tons per consecutive 12 calendar month period
T1	Tier I operating permit
T2	Tier II operating permit
U.S.C.	United States Code
VOC	volatile organic compound

2. INTRODUCTION AND APPLICABILITY

Spunstrand Inc. is a manufacturer of fiberglass products, and is located at 60662 Northside Frontage Road, Wallace, Idaho. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit styrene above the major source thresholds of 10 tons-per-year for any single HAP.

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for Spunstrand Inc.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

Section 1 – Acronyms, Units, and Chemical Nomenclature

The acronyms, units, and chemical nomenclature used in the permit are defined in this section.

Section 2 - Tier I Operating Permit Scope

The scope describes this permitting action.

Section 3 - Facility-wide Conditions

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements (MRRR) sufficient to assure compliance with a permit condition follows the permit condition.

Sections 4 - Emission Unit Specific Requirements

The emissions unit-specific sections of the permit contain the applicable requirements that specifically apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the Facility-wide Conditions Section. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements (MRRR) sufficient to assure compliance with an applicable requirement follows the applicable requirement.

Section 5 - Non-applicable Requirements and Insignificant Activities

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

This section contains a list of units or activities that are insignificant on the basis of size or production rate. Units and activities listed in this section must be listed in the permit application. The regulatory citation for units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

Section 6 - General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I facilities. The General Provisions have been reviewed by EPA and contain all terms and conditions required by IDAPA 58.01.01 et al as well as requirements from other air quality laws, rules and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and a rule or permit, the rule or permit shall govern.

3. FACILITY INFORMATION

3.1 Facility Description

Spunstrand manufactures reinforced duct work, pipes, tubing and tanks using a filament winding method. The operation consists of three work areas; the Main Building, the Blue Building, and the Warehouse. Emissions from the facility come from two sources:

- Fabrication: Fiberglass resin and gelcoat application processes, including filament winding machines and small scale fabrication operations performed in the Main and Blue Buildings, with emissions from normal building ventilation, and
- Cutting and Trimming: Fiberglass cutting performed in the cutting room of the Main Building, emissions are controlled by a baghouse.

Fabrication operations housed in the Main Building include three filament winding machines. Filament winding is a process of laying a band of resin impregnated fibers onto a rotating mandrel surface in a precise geometric pattern and curing to form the product. Glass fiber is used for the filament. Acetone storage and handling is also located in this building.

Small scale fabrication operations in the Main Building include a reducer machine, a pulling station and a chopper station. The reducer machine utilizes a filament winding process similar to the filament winding machines, but on a much smaller scale. The pulling station is used to extract the fabricated pipe from the mandrels, and small repairs or corrections are made using a hand held spray chopper at the chopping station.

The Blue Building is used for small scale hand lay-up fabrication, gel coat application and painting of finished products according to custom specifications. The attached conex boxes are used for storage of tooling mods and curing product.

The warehouse contains storage and a resin room, as well as wood cutting, and tooling operations.

In addition to fabrication operations, the Main Building houses cutting and trimming operations in the cutting room. Particulate emissions from cutting and trimming are controlled by a baghouse.

3.2 Facility Permitting History

Tier I Operating Permit History - Previous 5-year permit term 01/08/13 to 01/08/18

The following information is the permitting history of this Tier I facility during the previous five-year permit term. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

January 8, 2013 T1-2012.0023, Tier I renewal, Permit status (A, but will become S upon issuance of this permit)

Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

September 28, 2007 P- 060132, Initial PTC, Permit status (S)

September 7, 2012 P-2012.0050, Change Cyclone to Baghouse, Permit status (A)

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

4.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit.

4.2 Application Chronology

July 7, 2017	DEQ received an application.
August 15, 2017	DEQ determined that the application was complete.
November 7, 2017	DEQ made available the draft permit and statement of basis for peer and regional office review.
November 30, 2017	DEQ made available the draft permit and statement of basis for applicant review.
December 27, 2017 – January 26, 2018	DEQ provided a public comment period on the proposed action.
January 31, 2018	DEQ provided the proposed permit and statement of basis for EPA review.
March 22, 2018	DEQ issued the final permit and statement of basis.

5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

5.1 Process No. 1 - PROCESS DESCRIPTION

Table 5.1 lists the emissions units and control devices associated with fabrication of fiberglass composites.

Table 5.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device
Fiberglass Composite Fabrication	None
Cutting and Chopping	Baghouse

Fiberglass resin and gelcoat application processes, including filament winding machines and small scale fabrication operations are performed in the Main and Blue Buildings, with emissions exiting with normal building ventilation. The Blue Building is used for small scale hand lay-up fabrication, gel coat application and painting of finished products according to custom specifications.

In addition to fabrication operations, the Main Building houses cutting and trimming operations in the cutting room. Particulate emissions are controlled by a baghouse.

5.2 Insignificant Emissions Units Based on Size or Production Rate

This section contains a list of units or activities that are insignificant on the basis of size or production rate. Units and activities listed in this section must be listed in the permit application. Table 5.2 lists the units and activities which have been determined to be insignificant on the basis of size or production rate.

The regulatory authority for emissions units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

Table 5.2 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit / Activity	Regulatory Authority / Justification
Five (5) Monitor hot water heaters in main/warehouse	58.01.01.317.01 b.i. (5) / <5 million BTU's, NG only
Two (2) Reznor heater in warehouse	58.01.01.317.01 b.i. (5) / <5 million BTU's, NG only
Carrier heater in main/warehouse	58.01.01.317.01 b.i. (5) / <5 million BTU's, NG only
Three (3) heaters in blue building	58.01.01.317.01 b.i. (5) / <5 million BTU's, NG only
Office heater	58.01.01.317.01 b.i. (5) / <5 million BTU's, NG only

5.3 Non-applicable Requirements for Which a Permit Shield is Requested

This section of the permit lists the regulations for which the facility has requested, and DEQ proposes to grant, a permit shield pursuant to IDAPA 58.01.01.325. The facility has requested that this list be included in the permit as non-applicable requirements. The rules and regulations that the facility has requested a non-applicability determination on and the findings on which this permit shield is based are presented in Table 5.3.

Table 5.3 Non-applicable Requirements Analysis

Citation	Requirement Requested to be Listed as Non-Applicable	Explanation	Included as Non-applicable in Permit? (Y/N)
Permit to Construct No. P-2012.0050			
PC 3.5 – 3.6	Construction and operation notification	Facility certifies the requirement has already been met.	Y
Rules for the Control of Air Pollution in Idaho			
000	Legal Authority	Applies at all times. Does not include a source specific requirement.	N
001	Title and Scope	Applies at all times. Does not include a source specific requirement.	N
002	Written Interpretations	Applies at all times. Does not include a source specific requirement.	N
162	Modifying Physical Conditions	Applies at all times. Does not include a source specific requirement.	N
164	Polychlorinated Biphenyls (PCBs)	Applies at all times. Prohibitive rule that applies to all sources.	N
175- 181	Procedures and Requirements for FECs	Establishing procedures for obtaining a facility emission cap permit and is available to all source.	N
400 - 410	Tier II Operating Permits	DEQ may require a Tier II permit to attain or maintain ambient air quality standards.	N
441	Demonstration of Ambient Equivalence	Applies at all times. Does not include a source specific requirement.	N
460	Requirements for Emission Reduction Credits	Applies at all times. Does not include a source specific requirement.	N
461	Banking Emission Reduction Credits	Applies at all times. Does not include a source specific requirement.	N
500	Registration Procedures and Requirements for Portable sources.	Applies at all times. Specifies that registration is not required for mobile internal combustion engines.	N
517 -527	Motor Vehicle Inspection and Maintenance	Sets forth minimum standards for motor vehicle inspection programs in Ada and Canyon Counties..	Y

Table 5.3 Non-applicable Requirements Analysis (continued)

Citation	Requirement Requested to be Listed as Non-Applicable	Explanation	Included as Non-applicable in Permit? (Y/N)
550 - 560	Air Pollution Emergency Rule	Applies at all times.	N
563 - 574	Transportation Conformity	Only affects projects approved by USDOT	Y
575 - 581	Air Quality Standards and Area Classification	Applies to all facilities at all locations.	N
590	New Source Performance Standards	Facility does not have sources that are affected	Y
592 - 598	Stage 1 Vapor Collection	Applies only in Ada and Canyon Counties	Y
599	Gasoline Cargo Tanks	Applies only in Ada and Canyon Counties	Y
608	Weed Control Fires	Describes what is allowable open burning. Applies at all times to all facilities.	N
610	Industrial Flares	The Facility does not have a flare	Y
611	Residential Solid Waste Disposal Fires	Applies only to domestic households	Y
612	Landfill Disposal Site Fires	The facility does not operate a landfill	Y
613	Orchard Fires	The facility does not operate an orchard	Y
614	Prescribed Burning	Facility located on private land.	Y
615	Dangerous Material Fires	Applies to all facilities. Describes allowable forms of open burning.	N
616	Infectious Waste Burning	Applies to all facilities. Describes allowable forms of open burning.	N
617 - 624	Crop Residue Disposal	Crop residue disposal is generally-applicable, and including it here is in direct contradiction to PC 3.16.	N
626	Visible Emissions from Wigwam Burners	Facility does not have a wigwam.	Y
665 - 668	Regional Haze Rules	Rule for managing visibility. Generally applicable, and includes administrative requirements that apply.	N
676	Standards for New Sources	Facility does not have new units greater than 10 MMBtu/hr	Y
701 - 703	Particulate Matter	Some parts apply to units existing after 1979. Overbroad request for non-applicability.	N
725	Rules for Sulfur Content in Fuels	Rule applies to all persons and facilities. No person shall..."use" fuels with greater than the specified sulfur content	N
750 - 751	Rules for the Control of Fluoride	Applies to phosphate fertilizer plants	Y
760 - 764	Rules for the Control of Ammonia From Dairy Farms	Only applies to dairies.	Y
785 - 787	Rules for the Control of Incinerators	The facility does not have an incinerator.	Y
790 - 799	Rules for the Control of Nonmetallic Mineral Processing Plants	The facility does not include a non-metallic mineral processing plant	Y
800 - 802	Registration Fee for Permit by Rule	Facility does not have equipment covered by PBR	Y
805 - 808	Rules for the control of Hotmix Asphalt Plants	Facility does not include a Hotmix Asphalt Plant	Y
815 - 826	Rules for the Control of Kraft Pulp Mill	Clearly not applicable.	Y

Table 5.3 Non-applicable Requirements Analysis (continued)

Citation	Requirement Requested to be Listed as Non-Applicable	Explanation	Included as Non-applicable in Permit? (Y/N)
835 - 839	Rules for the Control of Rendering Plants	Facility does not include a rendering plant.	Y
845 - 848	Rules for Sulfuric Acid Plants	The facility does not include an acid plant	Y
855 - 858	Combined Zinc and Lead Smelters	The facility does not include a smelter of any type	Y
859 - 860	Standards for MSW Landfills	The facility does not include a landfill.	Y
Federal Regulations			
40 CFR 52.21	PSD Program	Any modification to the facility will be subject to the PSD thresholds. So the program is applicable.	N
40 CFR 60	New Source Performance Standards	The facility does not have any affected emission units.	Y
40 CFR 61, Except Subpart M	NESHAPs	Asbestos requirements (Subpart M) are included in the permit.	Y
40 CFR 63, Except Subparts WWWW and DDDDD	NESHAPs	Subparts WWWW and DDDDD are included in the permit.	Y
40 CFR 64	Compliance Assurance Monitoring	The facility does not have a pre-control emission unit with emissions over 100 tons per year.	Y
40 CFR 68	Chemical Accident Prevention Provisions.	Included in Tier I permit. Establishes threshold for applicability, if the threshold is exceeded the rule applies.	N
40 CFR 82, except Subparts E and F	Protection of Stratospheric Ozone	Facility does not meet the requirements for applicability for this standard.	Y
40 CFR 98	Mandatory Greenhouse Gas Reporting	This regulation is not an applicable requirement for Tier I permitting purposes therefore a determination of non-applicability for Tier I purposes and a permit shield is not needed. The rule applies on its own merits regardless of whether it is a Tier I applicable requirement or not.	N

5.4 Emissions Inventory

Table 5.4 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is 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 hour 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 emission is state or federally enforceable.

Listed below Table 5.4 are the references for the emission factors used to estimate the emissions. The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix B of this statement of basis.

Table 5.4 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)

Source Description	PM_{10} T/yr	NO_x[1] T/yr	SO_2[1] T/yr	CO[1] T/yr	VOC T/yr	Lead T/yr	HAP T/yr	GHG CO_2e T/yr
Fabrication		-	-	-	69	-	53.8	-
Cutting/Chopping	0.18	-	-	-		-		-
Total Emissions	0.21	-	-	-	69	-	53.8	-

1) Boilers and heaters are present only as insignificant sources, therefore no combustion emissions are in the PTE.

6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this T1 facility.

This section is divided into the following subsections.

- Facility-Wide Conditions (subsection 6.1);
- Emissions Unit-Specific Emissions Limits and MRRR (subsection 6.2)
  - 40 CFR 63 Subpart WWWW
  - Fabrication
  - Permit Shield;
- Tier I Operating Permit General Provisions. (subsection 6.3);

MRRR

Monitoring, recordkeeping and reporting requirements (MRRR) are the means with which compliance with an applicable requirement is demonstrated. In this section, the applicable requirement (permit condition) is provided first followed by the MRRR. Should an applicable requirement not include sufficient MRRR to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit (i.e. gap filling). In addition to the specific MRRR provided for each applicable requirement, generally applicable facility-wide conditions and general provisions may also be provided, such as performance testing, reporting, and certification requirements.

The legal and factual basis for each permit condition is provided for in this document. If a permit condition was changed due to facility draft comments or public comments, an explanation of the changes is provided.

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

6.1 Facility-Wide Conditions

Permit Condition 3.1 - Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/07]

MRRR (Permit Conditions 3.2 through 3.4)

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct facility-wide inspections of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

Permit Condition 3.5 - Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

MRRR (Permit Condition 3.6)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State only), 5/1/94]

Permit Condition 3.7 - Visible Emissions

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. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

MRRR (Permit Condition 3.8 through 3.9)

- Conduct facility-wide inspections of all emissions units subject to the visible emissions standards (or rely on continuous opacity monitoring);
- If visible emissions are observed, take appropriate corrective action and/or perform a Method 9 opacity test;
- Maintain records of the results of each visible emissions inspection.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Permit Conditions 3.10 through 3.14 - Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the excess emissions facility wide conditions and the regulations of IDAPA 58.01.01.130-136.

MRRR (Permit Conditions 3.11 through 3.14)

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136:

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory;
- Notify DEQ of each excess emissions events as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ;
- Maintain records of each excess emissions event.

Permit Condition 3.15 – Fuel-Burning Equipment PM Standards

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.16 - Open Burning

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 5/08/09]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.17 - Asbestos

The permittee shall comply with all applicable requirements of 40 CFR 61, Subpart M—"National Emission Standard for Asbestos."

[40 CFR 61, Subpart M]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.18 - Accidental Release Prevention

(a)

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

(b)

This facility is subject to 40 CFR Part 68 and shall certify compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by 40 CFR 70.6(c)(5).

[40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 68.215(a)(ii)]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.19 - Recycling and Emissions Reductions

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.20 - NESHAP General Provisions

This facility is subject to NESHAP Subparts **WWWW**, and is therefore required to comply with applicable General Provisions.

[40 CFR 60/63, Subpart A]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.21 - Monitoring and Recordkeeping

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating 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, 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 58.01.01.322.06, 07, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Conditions 3.22 through 3.25 - Performance Testing

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All 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, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

MRRR (Permit Conditions 3.23 and 3.25)

The permittee shall submit compliance test report(s) to DEQ following testing.

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Permit Condition 3.26 - Reports and Certifications

This permit condition establishes generally applicable MRRR for submittal of reports, certifications, and notifications to DEQ and/or EPA as specified.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.27 - Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein.

[IDAPA 58.01.01.107, 4/7/11]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

6.2 Emissions Unit-Specific Emissions Limits and MRRR

Section 4. - 40 CFR 63 Subpart WWWW

Section 4 of the permit incorporates the requirements of 40 CFR 63 Subpart WWWW. Should there be a conflict between Subpart WWWW and Section 4 of the permit, Subpart WWWW shall govern including any amendments to the regulation.

Section 5. - FABRICATION

Permit Condition 5.2

Emissions of PM_{10} from the dust collection baghouse or equivalent device shall not exceed 14.4 pounds per day. This permit condition is an existing applicable requirement from PTC No. P-2012.0050 issued September 7, 2012.

MRRR - Permit Condition 5.3

In order to assure compliance with the particulate matter emission limit Permit Condition 5.3 requires the operation of a baghouse, or equivalent control device, to control emissions from cutting and trimming operations. This condition also requires that a procedures document be developed to maintain the baghouse in good working order. Weekly observation for visible emissions are required, if any visible

emission are observed the permittee shall follow the provisions in the baghouse procedures document including inspecting the baghouse and recording the results of the inspection.

Permit Condition 5.4

This permit condition is a state only permit condition and requires the development of an odor management plan to assure compliance with the odor standard included in Permit Condition 3.6. This is an existing permit condition from PTC No. P-2012.0050 issued September 7, 2012.

Section 6. – Permit Shield

Spunstrand requested that a listing of non-applicable requirement be included in the permit in accordance with IDAPA 58.01.01.325. See Section 5.3 of this statement of basis for details of the regulatory analysis for the permit shield.

6.3 General Provisions

Unless expressly stated, there are no MRRR for the general provisions.

General Compliance, Duty to Comply

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

General Compliance, Need to Halt or Reduce Activity Not a Defense

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

General Compliance, Duty to Supplement or Correct Application

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening, Additional Requirements, Material Mistakes, Etc.

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

Reopening, Permitting Actions

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01. 383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98; Idaho Code §39-108; 40 CFR 70.6(b)(1), (2)]

Inspection and Entry

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

- Enter upon the permittee's premises where a Tier I 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; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

New Applicable Requirements

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

Certification

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
    - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
    - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
    - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
    - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and

- The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as specified.

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified;
- All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

False Statements

The permittee may not 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]

No Tampering

The permittee may not 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]

Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months as specified.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a

different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required, Emissions Trading

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

7. REGULATORY REVIEW

7.1 Attainment Designation (40 CFR 81.313)

The facility is located in a portion of Shoshone County which is designated as attainment or unclassifiable for PM_{10}, $PM_{2.5}$, CO, NO_2, SO_x, and Ozone. Reference 40 CFR 81.313.

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

The facility is a Tier I major source in accordance with IDAPA 58.01.01.008.10.a.i. because potential styrene emissions exceed 10 tons per year. No other regulated air pollutant exceeds the major facility threshold. See the emission inventory section of this statement of basis.

7.3 PSD Classification (40 CFR 52.21)

Spunstrand' s facility is not a listed source category (40 CFR 52.21.b.i.a) and potential emissions of new source review regulated air pollutants do not exceed 250 tons per year therefore the facility is not a PSD major facility.

7.4 NSPS Applicability (40 CFR 60)

The facility does not include any emission units that are affected by any of the subpart of 40 CFR 60.

7.5 NESHAP Applicability (40 CFR 61)

The facility does not include any emission units that are affected by any of the subpart of 40 CFR 61, except Subpart M (Asbestos) which is include in Facility Wide Permit Condition 3.18.

7.6 MACT Applicability (40 CFR 63)

National Emission Standards for Hazardous (NESHAPS) Air Pollutants for Reinforced Plastic Composites Production - 40 CFR 63, Subpart WWWW

This subpart establishes National Emissions Standards For Hazardous Air Pollutants (NESHAP) for reinforced plastic composites production. This subpart also establishes compliance options, operating requirements, and work practice requirements to demonstrate initial and continuous compliance with the Hazardous Air Pollutants (HAP) emissions standards for open molding, polymer casting, mixing, and cleaning of equipment procedures used in reinforced plastic composites manufacture. The requirements of

this subpart apply to this facility, because the facility-wide HAP emissions of the facility exceed major source thresholds. The HAP emissions standards of this subpart are provided in Appendix B. Also, the following regulatory breakdown from the previous SOB is carried forward. The subpart and requirements have not changed during this renewal period. The subpart is still incorporated in the permit as Section 4, NESHAP 40 CFR 63, Subpart WWWW, permit conditions 4.1 through 4.22:

40 CFR 63.5785(a) Am I subject to this subpart?
The requirements of this subpart apply to this facility because the facility owns or operates a reinforced plastic composites production facility that is located at a major source of HAP emissions.

40 CFR 63.5787 What if I also manufacture fiberglass boats or boat parts?
40 CFR 63.5787(a) applies because the source meets the applicability criteria in 40 CFR 63.5785, and is not subject to the Boat Manufacturing NESHAP (40 CFR part 63, subpart VVVV). The requirements of 40 CFR 63.5785(b) through (d) do not apply because the facility is not subject to the Boat Manufacturing NESHAP (40 CFR part 63, subpart VVVV).

40 CFR 63.5790 What parts of my plant does this subpart cover?
In accordance with 40 CFR 63.5790(a), the facility is subject to this subpart because it is a new or existing facility. In accordance with 40 CFR 63.5790(b), the affected sources located at the facility are open molding, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts the facility manufactures.

40 CFR 63.5795 How do I know if my reinforced plastic composites production facility is a new affected source or an existing affected source?
In accordance with 40 CFR 63.5795(a), the facility is an existing source because it began construction before August 2, 2001.

40 CFR 63.5796 What are the organic HAP emissions factor equations in Table 1 to this subpart, and how are they used in this subpart?
This section is informational and is included in the permit as PC 4.1.

40 CFR 63.5797 How do I determine the organic HAP content of my resins and gel coats?
In accordance with 40 CFR 63.5797, the permittee may rely on information provided by the material manufacturer, such as manufacturer's formulation data and material safety data sheets (MSDS), using the procedures specified in 40 CFR 63.5797(a) through (c). This is included in the permit as PC 4.2.

40 CFR 63.5798 What if I want to use, or I manufacture, an application technology (new or existing) whose organic HAP emissions characteristics are not represented by the equations in Table 1 to this subpart?
This section does not apply to the permittee.

40 CFR 63.5799 How do I calculate my facility's organic HAP emissions on a tpy basis for purposes of determining which paragraphs of 40 CFR 63.5805 apply?
In accordance with 40 CFR 63.5799, the facility is an existing facility, and must use the procedures in either paragraph (b)(1) or (2) of 40 CFR 63.5799 to calculate the facility's organic HAP emissions in tpy for purposes of determining which paragraphs in § 63.5805 apply to the facility. The permittee must also comply with the calculation and notification requirements of 40 CFR 63.5799(c).

40 CFR 63.5800 When do I have to comply with this subpart?
In accordance with 40 CFR 63.5800, the permittee must comply with the standards in this subpart by the dates specified in Table 2 to this subpart. For an existing source, the date specified in Table 2 is April 21, 2006. The permittee has organic HAP emissions standard based on a 12-month rolling average, and, therefore, must begin collecting data on the compliance date in order to demonstrate compliance.

40 CFR 63.5805 What standards must I meet to comply with this?
40 CFR 63.5805(a), (a)(1), and (a)(2) of (a) do not apply to the facility because it does not have any centrifugal casting or continuous casting/lamination operations. 40 CFR 63.5805(b) applies because the facility is an existing facility. 40 CFR 63.5805(c) does not apply because the facility is not a new facility. 40 CFR 63.5805(d)(1) and (d)(2) apply because the facility does not emit 100 tpy or more of HAP from

the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, SMC manufacturing, mixing, and BMC manufacturing, and the facility does not manufacture reinforced plastic composites parts using open molding or pultrusion operations.

The facility is subject to 40 CFR 63.5805(g), which requires repair operations subject to this subpart as defined in 40 CFR 63.5785 to meet the requirements in Tables 3 and 4 to this subpart and are not required to meet the 95 percent organic HAP emissions reduction requirements in paragraph (a)(1) or (d) of 40 CFR 63.5805.

All work practices in Tables 4 apply except 1, 4, 5, and 9. The following operations occur at the facility and have emission limits in Tables 3:

open molding CR/HS operations that use mechanical resin application

open molding CR/HS operations that use filament application

open molding CR/HS operations that use manual resin application

open molding low flame spread/low-smoke product operations that use mechanical resin application

open molding low flame spread/low-smoke product operations that use filament application

open molding low flame spread/low-smoke product operations that use manual resin application

open mold gel coat operations that use tooling gel coating

open mold gel coat operations that use white/off white pigmented gel coating

open mold gel coat operations that use all other pigmented gel coating

These requirements are included in the permit as PC 4.3.

40 CFR 63.5810 What are my options for meeting the standards for open molding and centrifugal casting operations at new and existing sources?
The facility must use one of the methods in 40 CFR 63.5810 paragraphs (a) through (d) to meet the standards for open molding in Table 3 of this subpart. These requirements are included in the permit as PC 4.4.

40 CFR 63.5820 What are my options for meeting the standards for continuous lamination/casting operations?
Paragraphs (a) through (d) of this section do not apply to the facility because the facility has open molding operations, and is not subject to the standards continuous lamination/casting operations.

40 CFR 63.5830 What are my options for meeting the standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reductions requirement?
40 CFR 63.5830 and paragraphs (a) through (d) of the section do not apply to the facility because the facility has open molding operations, and is not subject to the standards for pultrusion operations subject to the 60 weight percent organic HAP emissions reductions requirement.

40 CFR 63.5835 What are my general requirements for complying with this subpart?
Paragraph (a) of this section applies to the facility and requires the facility to be in compliance at all times with the work practice standards in Table 4 and the organic HAP emissions limits in Table 3. Paragraph (b) of this section does not because the facility does not use add-on controls. Paragraphs (c) and (d) of 40 CFR 63.5835 generally apply to all facilities subject to 40 CFR 63, Subpart WWWW. These requirements are included in the permit as PC 4.5

40 CFR 63.5840 By what date must I conduct a performance test or other initial compliance demonstration?
The facility must comply with the data collection and compliance demonstration requirements of this paragraph by the compliance date specified by 40 CFR 63.5800. Because the facility is an open molding operation that elected to meet an organic HAP emissions limit on a 12-month rolling average, the facility must initiate collection of the required data on the compliance date, and demonstrate compliance 1 year after the compliance date.

40 CFR 63.5845 When must I conduct subsequent performance tests?
This section does not apply to the permittee because it does not operate an add-on control device to meet a standard.

40 CFR 63.5850 How do I conduct performance tests, performance evaluations, and design evaluations?
This section does not apply to the permittee because these requirements apply to facilities that operate an add-on control device to meet a standard.

40 CFR 63.5855 What are my monitor installation and operation requirements?
This section does not apply to the permittee because these requirements apply to facilities that operate an add-on control device to meet a standard.

40 CFR 63.5860 How do I demonstrate initial compliance with the standards?
Paragraph (a) of this section applies to the facility and requires the facility demonstrate initial compliance with each applicable organic HAP emissions standard in 40 CFR 63.5805 paragraphs (a) through (h) by using the procedures shown in Tables 8 and 9 of this subpart . Specifically, only item 1 of Table 8 applies, and items 2, 3, and 8 of Table 9 apply. Paragraph (b) of this section does not apply to the permittee because these requirements apply to facilities that operate an add-on control device to meet a standard.

40 CFR 63.5865-5890 What data must I generate to demonstrate compliance with the standards for continuous lamination/casting operations?
This section does not apply to the permittee because these requirements apply to facilities that have continuous lamination/casting operations. The facility has open molding operations.

40 CFR 63.5895 How do I monitor and collect data to demonstrate continuous compliance?
Paragraph (a) of this section does not apply to the permittee because this requirement applies to facilities that operate an add-on control device to meet a standard. Paragraphs (b), (b)(1) through (b)(3), (c) and (d) of this section apply. Paragraph (e) of this section does not apply to the permittee because this requirement applies to facilities that operate pultrusion machines. These requirements are included in the permit as PC's 4.6, 4.7, and 4.8.

40 CFR 63.5900 How do I demonstrate continuous compliance with the standards?
Paragraph (a)(1) and (d) of this section do not apply to the permittee because these requirements apply to facilities that operate an add-on control device to meet a standard. Paragraphs (a)(2) through (a)(4), (b), (c) and (e) of this section apply. These requirements are included in the permit as PC 4.9.

40 CFR 63.5905 What notifications must I submit and when?
Paragraphs (a) and (b) of this section apply. Although the facility is a new source, because at least part of the facility was under construction prior to August 2, 2001, the facility is subject to the initial notification requirements for existing sources under Table 13.

40 CFR 63.5910 What reports must I submit and when?
Paragraphs (a), (b), (b)(1) through (b)(5), (c), (c)(1) through (c)(5), (h), (i) and (g) of this section apply. Paragraphs (c)(6), (e), and (e)(1) through (e)(12) do not apply because the facility does not operate a continuous monitoring system. Paragraph (f) does not apply because 40 CFR 63.5805(a)(1) and (d). These requirements are included in the permit as PC's 4.10 through 4.17.

40 CFR 63.5915 What records must I keep?
Paragraphs (a), (a)(1) through (3), (c), and (d) of this section apply. Paragraphs (b) of this section does not apply to the permittee because this requirement applies to facilities that operate an add-on control device, which the permittee does not. Paragraphs (e)(1) through (4) of this section do not apply because the facility does not have new or existing continuous lamination/ casting operations. These requirements are included in the permit as PC's 4.18 through 4.20.

40 CFR 63.5920 In what form and how long must I keep my records?
Paragraphs (a) through (d) of this section apply. These requirements are included in the permit as PC 4.21.

40 CFR 63.5925 What parts of the General Provisions apply to me?
This section and Table 15 of Subpart WWWW, applies to this facility as specified is included in the permit as PC 4.22.

40 CFR 63.5930 Who implements and enforces this subpart?
This section does not apply to the facility

40 CFR 63.5935 What definitions apply to this subpart?
The definitions of this section apply to the facility.

National Emission Standards for Hazardous (NESHAPS) Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters - 40 CFR 63, Subpart DDDDD

§ 63.7506 Do any boilers or process heaters have limited requirements?

(c) The affected boilers and process heaters listed in paragraphs (c)(1) through (4) of this section are not subject to the initial notification requirements in § 63.9(b) and are not subject to any requirements in this subpart or in subpart A of this part (i.e. , they are not subject to the emission limits, work practice standards, performance testing, monitoring, SSM plans, site-specific monitoring plans, recordkeeping and reporting requirements of this subpart, or any other requirements in subpart A of this part.

(3) Existing small gaseous fuel boilers and process heaters.

Spunstrand' s boilers are all existing small gaseous fuel boilers and are therefore not subject to any requirements in this Subpart or in Subpart A.

7.7 CAM Applicability (40 CFR 64)

§ 64.2 Applicability.

(a) General applicability. Except for backup utility units that are exempt under paragraph (b)(2) of this section, the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

(1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;

(2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and

(3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in § 64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

The only control device that is used to reduce emission to meet standards is the cutting/trimming baghouse. Pre-control device emissions are less than 100 tons per year therefore CAM does not apply.

7.8 Acid Rain Permit (40 CFR 72-75)

Spunstrand is not affected by the acid rain permit requirements of 40 CFR 72 – 75.

8. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from December 27, 2017 to January 26, 2018. During this time, comments were submitted in response to DEQ's proposed action. A response to public comments document has been crafted by DEQ based on comments submitted during the public comment period. That document is part of the final permit package for this permitting action.

9. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on January 31, 2018 via e-mail. By March 17, EPA Region 10 had not responded to DEQ via e-mail indicating no EPA response.

Appendix A - Emissions Inventory

Source Description	PM_{10} T/yr	NO_x T/yr	SO_2 T/yr	CO T/yr	VOC T/yr	Lead T/yr	HAP T/yr	GHG CO_2e T/yr
Fabrication		-	-	-	69	-	53.8	-
Cutting/Chopping	0.18	-	-	-		-		-
Total Emissions	0.21	-	-	-	69	-	53.8	-

Appendix B – Table 1 to Subpart WWWW

Table 1 to Subpart WWWW of Part 63—Equations To Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams

Table 1 to Subpart WWWW of Part 63--Equations to Calculate Organic HAP Emissions Factors for Specific Open Molding and Centrifugal Casting Process Streams[1]

As specified in §63.5816, use the equations in the following table to calculate organic HAP emissions factors for specific open molding and centrifugal casting process streams:

If your operation type is a new or existing...	And you use...	With...	Use this organic HAP Emissions Factor (EF) Equation for materials less than 33 percent organic HAP (19 percent organic HAP for nonatomized gel coat)[2][3][4]	Use this organic HAP emissions Factor (EF) Equation for materials with 33 percent or more organic HAP (19 percent for nonatomized gel coat)[2][3][4]
i. open molding operation	a. manual resin application	i. nonvapor-suppressed resin	EF = 0.126 × %HAP × 2000	EF = (0.286 × %HAP) - 0.0529) × 2000
		ii. vapor-suppressed resin	EF = 0.126 × %HAP × 2000 × (1-(0.5 × VSE factor))	EF = (((0.286 × %HAP) - 0.0529) × 2000 × (1-(0.5 × VSE factor))
		iii. vacuum bagging/closed-mold curing with roll out	EF = 0.126 × %HAP × 2000 × 0.8	EF = (((0.286 × %HAP) - 0.0529) × 2000 × 0.8
		iv. vacuum bagging/closed-mold curing without roll-out	EF = (0.126 × %HAP × 2000 × 0.5	EF = (((0.286 × %HAP) - 0.0529) × 2000 × 0.5
	b. aerosol mechanical resin application	i. nonvapor-suppressed resin	EF = 0.369 × %HAP × 2000	EF = (((0.714 × %HAP) - 0.181 × 2000
		ii. vapor-suppressed resin	EF = 0.369 × %HAP × 2000 × (1-(0.45 × VSE factor))	EF = (((0.714 × %HAP) - 0.181 × 2000 × (1-(0.45 × VSE factor))
		iii. vacuum bagging/closed-mold curing with roll out	EF = 0.369 × %HAP × 2000 × 0.85	EF = (((0.714 × %HAP) - 0.181 × 2000 × 0.85
		iv. vacuum bagging/closed-mold curing without roll-out	EF = 0.369 × %HAP × 2000 × 0.55	EF = (((0.714 × %HAP) - 0.181 × 2000 × 0.55
	c. nonatomized mechanical resin application	i. nonvapor-suppressed resin	EF = 0.207 × %HAP × 2000	EF = (((0.157 × %HAP) - 0.0165) × 2000
		ii. vapor-suppressed resin	EF = 0.207 × %HAP × 2000 × (1-(0.45 × VSR factor))	EF = (((0.157 × %HAP) - 0.0165) × 2000 × (1-(0.45 × VSR factor))
		iii. closed-mold curing with roll out	EF = 0.207 × %HAP × 2000 × 0.85	EF = (((0.157 × %HAP) - 0.0165) × 2000 × 0.85
		iv. vacuum bagging/closed-mold curing without roll-out	EF = 0.207 × %HAP × 2000 × 0.55	EF = (((0.157 × %HAP) - 0.0165) × 2000 × 0.55
	d. atomized mechanical resin application with robotic or automated spray control[5]	nonvapor-suppressed resin	EF = 0.369 × %HAP × 2000 × 0.77	EF = (((0.714 × %HAP) - 0.181 × 2000
	e. filament application[6]	i. nonvapor-suppressed resin	EF = 0.184 × %HAP × 2000	EF = (((0.2746 × %HAP) - 0.02381 × 2000
		ii. vapor-suppressed resin	EF = 0.18 × %HAP × 2000	EF = (((0.2746 × %HAP) - 0.02381 × 2000 × 0.55
	f. chopped spray gel coat application	nonvapor-suppressed gel coat	EF = 0.443 × %HAP × 2000	EF = (((0.03346 × %HAP) - 0.195) × 2000

	g. nonatomized spray gel coat application	nonvapor-suppressed gel coat	EF = 0.185 x %HAP x 2000	EF = ((0.4505 x %HAP)-0.0505) x 2000
	h. atomized spray gel coat application using robotic or automated spray	nonvapor-suppressed gel coat	EF = 0.445 x %HAP x 2000 x 0.73	EF = ((1.03646 x %HAP)-0.1951) x 2000 x 0.73
2. centrifugal casting operations [7,8]	a. heated air blown through molds	nonvapor-suppressed resin	EF = 0.558 x (%HAP) x 2000	EF = 0.558 x (%HAP) x 2000
	b. vented molds, but air vented through the molds is not heated	nonvapor-suppressed resin	EF = 0.026 x (%HAP) x 2000	EF = 0.026 x (%HAP) x 2000

Footnotes to Table 1

[1] The equations in this table are intended for use in calculating emission factors to demonstrate compliance with the emission limits in subpart WWWW. These equations may not be the most appropriate method to calculate emission estimates for other purposes. However, this does not preclude a facility from using the equations in this table to calculate emission factors for purposes other than rule compliance if these equations are the most accurate available.

[2] To obtain the organic HAP emissions factor value for an operation with an add-on control device multiply the EF above by the add-on control factor calculated using Equation 1 of §63.5810. The organic HAP emissions factors have units of lbs of organic HAP per ton of resin or gel coat applied.

[3] Percent HAP means total weight percent of organic HAP (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e., 33 percent HAP should be input as 0.33, not 33.

[4] The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.

[5] This equation is based on a organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.

[6] Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, use the appropriate manual or mechanical application organic HAP emissions factor equation.

[7] These equations are for centrifugal casting operations where the mold is vented during spinning. Centrifugal casting operations where the mold is completely sealed after resin injection are considered to be closed molding operations.

[8] If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, use the appropriate open molding equation with covered cure and no rollout to determine an emission factor for operations prior to the closing of the centrifugal casting mold. If the closed centrifugal casting mold is vented during spinning, use the appropriate centrifugal casting equation to calculate an emission factor for the portion of the process where spinning and cure occur. If a centrifugal casting operation uses mechanical or manual resin application techniques to apply resin to an open centrifugal casting mold, and the mold is then closed and is not vented, treat the entire operation as open molding with covered cure and no rollout to determine emission factors.