



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

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

September 27, 2018

Chuck Ceccarelli, President  
Inventive LLC dba In the Ditch Towing Products  
3190 Industrial Way  
Mountain Home, ID 83647-3983

RE: Facility ID No. 039 - 00036, Inventive LLC dba In the Ditch Towing Products, Mountain Home  
Final Permit Letter

Dear Mr. Ceccarelli:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2011.0070 Project 62067 to Inventive LLC dba In the Ditch Towing Products located at Mountain Home for a permit modification to increase coating usage and install additional equipment. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received May 24, 2018.

This permit is effective immediately and replaces PTC No. P-2011.0070, issued on March 4, 2011. This permit does not release Inventive LLC dba In the Ditch Towing Products from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard Street, Boise, Idaho 83706, Fax (208) 208-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Thomas Krinke, Air Quality Compliance Officer, at (208) 373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Tom Burnham at (208) 373-0502 or [tom.burnham@deq.idaho.gov](mailto:tom.burnham@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\tb  
Permit No. P-2011.0070 PROJ 62067  
Enclosures

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** Inventive LLC dba In The Ditch Towing Products  
**Permit Number** P-2011.0070  
**Project ID** 62067  
**Facility ID** 039-00036  
**Facility Location** 3195 Industrial Way  
Mountain Home, ID 83647

### Permit Authority

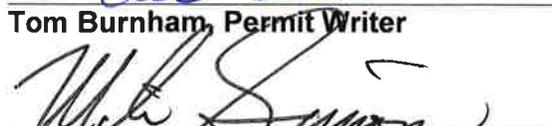
This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200-228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has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

**Date Issued** September 27, 2018



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Tom Burnham, Permit Writer



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Mike Simon, Stationary Source Manager

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# 1 Permit Scope

## Purpose

- 1.1 This is a modified permit to construct (PTC) to increase coating usage and install additional equipment.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2011.0070, issued on March 4, 2011.

## Regulated Sources

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

**Table 1.1 Regulated Sources**

Permit Section	Source	Control Equipment
2	<u>(12) natural gas heaters:</u>	None
	<u>H1 Shop bathroom heater</u> Manufacturer: Modine Model: HD125 Maximum Capacity: 0.125 MMBtu/hr	
	<u>H2 Heater</u> Manufacturer: Advanced Distributor Product Model: FSA N 75 Maximum Capacity: 0.075 MMBtu/hr	
	<u>H3 Mill heater</u> Manufacturer: Renzor Model: V3 T-COR2 UDAP 60 Maximum Capacity: 0.06 MMBtu/hr	
	<u>H4-5 Welding room heaters</u> Manufacturer: Infrasave and Renzor Model: X-IL 50-N and UDAP250 Maximum Capacity: 0.05, 0.25 MMBtu/hr	
	<u>H6-8 Heaters</u> Manufacturer: Infrasave Model: X-IL 50-N, X-IL 100-N, X-IL 37-N Maximum Capacity: 0.05, 0.1, 0.037 MMBtu/hr	
	<u>H9 – Paint room heater</u> Manufacturer: Advanced Distributor Product Model: SEP-230A-4 Maximum Capacity: 0.23 MMBtu/hr	
	<u>H10-11 Shipping room heaters</u> Manufacturer: Advanced Distributor Product Model: SEP-175A-5, SEP-300A-5 Maximum Capacity: 0.175, 0.30 MMBtu/hr	
	<u>H12- Powder coating oven</u> Manufacturer: Steelman Industries Inc Model: 8810 GSP-OB Maximum Capacity: 0.5 MMBtu/hr	

**Table 1.2 Regulated Sources (continued)**

Permit Section	Source	Control Equipment
3	<p><u>Paint spray booth:</u>                      Manufacturer: Unknown                      Manufacture date: Pre-2013                      Model: Unknown</p> <p><u>Powder coating booth:</u>                      Manufacturer: Steelman Industries Inc                      Manufacture date: 2018                      Model: 8810 GSP-OB</p>	<p><u>Pre-2013 Paint spray booth filter system:</u>                      Booth Type(s): Side Draft                      Particulate filtration method: Dry Filters                      Manufacturer(s): Viledon or equivalent                      Model(s): Series 400 or equivalent                      PM/PM<sub>10</sub> Control Efficiency: 98% or greater</p> <p><u>Coating spray gun(s):</u>                      Manufacturer(s): Anesta Iwata                      Model(s): LPH-101, LPH-400-LVB/-LVC/-LVX                      or equivalent                      Type: HVLP or equivalent                      Transfer Efficiency: 65% or greater</p> <p><u>Steeleman powder coating booth filter system:</u>                      Booth Type(s): Side Draft                      Particulate filtration method: Dry Filters                      Manufacturer(s): Apel or equivalent                      Model(s): C106B2 or equivalent                      PM/PM<sub>10</sub> Control Efficiency: 98% or greater</p> <p><u>Coating spray gun(s):</u>                      Manufacturer(s): Gema or equivalent                      Model(s): OptiFlex 2F or equivalent                      Type: HVLP or equivalent                      Transfer Efficiency: 65% or greater</p>
4	<p><u>(13) welders:</u>                      Manufacturer: Lincoln Electric and Millermatic                      Model: 300P, 251, 252                      Manufacture Date: Unknown</p> <p><u>Laser Cutters</u>                      Manufacturer: TRUMPF                      Model: 2030 and 3030                      Manufacture Dates: Unknown</p> <p><u>Plasma Cutter</u>                      Manufacturer: Hypertherm                      Model: 65                      Manufacture Date: Unknown</p> <p><u>Metal Saws</u>                      Manufacturer: Marvel                      Model: 380A PC3360 and PA10/3EPC                      Manufacture Dates: Unknown                      Manufacturer: Ellis                      Model: 1600                      Manufacture Date: Unknown</p>	<p>None</p> <p>TRUMPF Micropore Fileter                      PM/PM<sub>10</sub> Control Efficiency: 99.998%</p> <p>None</p> <p>None</p>

## 2 Combustion Sources

### 2.1 Process Description

Twelve natural gas heaters provide space heating and coat curing. The twelve sources are located throughout the facility.

### 2.2 Control Device Descriptions

**Table 2.1 Combustion Sources Description**

Emissions Units / Processes	Control Devices	Emission Points
H1 Shop bathroom heater	None	hop bathroom vent
H2 Heater	None	H2 heater exhaust
H3 Mill heater	None	Mill room vents
H4-5 Welding room heaters	None	Welding room vents
H6-8 Heaters	None	H6-8 heaters exhaust
H9 – Paint room heater	None	Paint room vents
H10-11 Shipping room heaters	None	Shipping room vents
H12- Powder coating oven	None	Powder coating oven exhaust

## Emission Limits

### 2.3 Emission Limits

The emissions from the combustion sources stacks or vents shall not exceed any corresponding emissions rate limits listed in Table 2.2.

**Table 2.2 Combustion Sources Emission Limits <sup>(a)</sup>**

Source Description	PM <sub>10</sub> <sup>(b)</sup>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
All combustion units	0.015	0.06	0.001	0.01	0.191	0.84	0.160	0.70	0.011	0.05

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by AP-42 factors published by EPA.
- d Tons per any consecutive 12-calendar month period.

[9/27/2018]

### 2.4 Opacity Limit

Emissions from the combustion sources, paint booths, or fabrication stacks, or any other stacks, vents, or functionally equivalent opening associated with the combustion sources, paint booths, or fabrication, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[9/27/2018]

## **Operating Requirements**

### **2.5 Fuel-Burning Equipment**

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas.

[9/27/2018]

### **2.6 Fuel Restriction**

The Fuel-Burning Equipment shall combust natural gas exclusively.

[9/27/2018]

### 3 Coating Operation

#### 3.1 Process Description

Wet paint and coating materials are manually-applied to parts using one of three HVLP spray guns in a paint booth. Dry powder coating will be manually-applied using one HVLP spray gun in a separate paint booth and is subsequently cured in an oven. Prior to painting, work parts are prepared and cleaned first using spraying foam, wastewater neutralization, and pressure washing, respectively.

#### 3.2 Control Device Descriptions

Table 3.1 Coating Operation Description

Emissions Units / Processes	Control Devices	Emission Points
Two Paint booths	Dry Filters	Paint booth exhausts

### Emission Limits

#### 3.3 Emission Limits

The emissions from the paint booth stacks shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Coating Operation Emission Limits <sup>(a)</sup>

Source Description	PM <sub>10</sub> <sup>(b)</sup>		VOC <sup>(c)</sup>	
	lb/hr	T/yr	lb/hr	T/yr
Coating operations	0.080	0.30	2.89	10.80

a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.

b) PM including condensable PM as defined in IDAPA 58.01.01.006, with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers for PM<sub>2.5</sub>, and less than or equal to a nominal 10 micrometers for PM<sub>10</sub>.

c) Volatile organic compounds (VOC).

[9/27/2018]

### Operating Requirements

#### 3.4 Daily Coating Usage Scenario

Unless the permittee is complying with an Alternate Daily Coating Usage Scenario which demonstrates compliance with Coating Emission Limits and Screening Emission Rates and Modeled Concentration Limits, the permittee shall comply with the daily coating usage limits in Table 3.3.

Table 3.3 Approved Daily Coating Usage Scenario

Coating Material	Daily Coating Usage Limit (gal/day) <sup>(a)</sup> or (lb/day) <sup>(b)</sup>
PPG Polyurethane 2.3/2.8 VOC DTM	14.0 <sup>(a)</sup>
PPG Urethane Accelerator	0.014 <sup>(a)</sup>
PPG Urethane Hardener	14.0 <sup>(a)</sup>
TCI SD Flat Black 9030-90922	60.0 <sup>(b)</sup>

a) Gallons per calendar day

b) Pounds per day for powder coating

[9/27/2018]

### 3.5 Annual Coating Usage Limits

The permittee shall not exceed the annual coating usage limits in Table 3.4.

Table 3.4 Annual Coating Usage Limits

Coating Material	Annual Coating Usage Limit (gal/yr) <sup>(a)</sup> or (lb/yr) <sup>(b)</sup>
PPG Polyurethane 2.3/2.8 VOC DTM	4,212.0 <sup>(a)</sup>
PPG Urethane Accelerator	5.0 <sup>(a)</sup>
PPG Urethane Hardener	4,212.0 <sup>(a)</sup>
TCI SD Flat Black 9030-90922	18,720.0 <sup>(b)</sup>

a) Gallons per rolling consecutive 12-calendar-month period

b) Pounds per rolling consecutive 12-calendar-month period for powder coating

[9/27/2018]

### 3.6 Spray Gun and Spray Booth Filter System

- All painting at this facility, including application of powder coating, shall be conducted inside the booth with filters in place, fan(s) operating, and door(s) closed.
- All painting shall be conducted with a HVLP, electrostatic, airless or air assisted spray gun with a minimum 65% transfer efficiency as documented by the spray gun manufacturer.
- The permittee shall install, maintain, and operate according to the manufacturer's specifications and recommendations, a spray booth and powder coating booth filter systems with a minimum capture efficiency of no less than 98% for PM10 for emissions as documented by the filter manufacturer.

[9/27/2018]

### Alternate Daily Coating Usage Scenarios

Unless using a Daily Coating Usage Scenario for which compliance has previously been determined in Table 3.3 (such as when new or reformulated coating materials are introduced), each day before coating materials are used the permittee shall follow the procedures of this section. The permittee shall not use any new Daily Coating Usage Scenario until coating TAP compliance and Coating Emission Limit compliance have been demonstrated for that Scenario according to the procedures below.

#### 3.7 Propose a Daily Coating Usage Scenario

Prior to using or implementing a new Daily Coating Usage Scenario:

- The permittee shall propose and record maximum daily coating usage limits for each coating material that will be used in the Scenario, in gallons per day (gal/day). The permittee shall not use or implement any Scenario that does not have recorded maximum daily coating usage limits.
- The permittee shall estimate emissions of PM<sub>10</sub>/PM<sub>2.5</sub>, VOC, and all TAP listed in Table 3.5 for the Scenario (lb/day for each pollutant), using the procedures described below for estimating emissions.
- The permittee shall demonstrate coating TAP compliance for the Scenario, using the procedures described below for demonstrating coating TAP compliance. The permittee shall not use or implement any Scenario that does not demonstrate coating TAP compliance.

- The permittee shall demonstrate Coating Emission Limit compliance for the Scenario, using the procedures described below for demonstrating Coating Emission Limit compliance. The permittee shall not use or implement any Scenario that does not demonstrate Coating Emission Limit compliance.
- The daily coating usage limits and emission estimates used in determining coating TAP compliance and Coating Emission Limit compliance shall be based on estimated emissions from all coatings to be used from all coating operations at the facility (i.e., facility-wide).

[9/27/2018]

### 3.8 Estimate Coating TAP Emissions

TAP emissions shall be estimated for all TAP listed in Table 3.5:

- Emissions shall be estimated by multiplying each maximum daily coating usage rate (gal/day) by the TAP content (lb/gal) of that coating, and summing the total emissions from all coating materials (lb/day). TAP emissions which are designated as a particulate in Table 3.5 may also be multiplied by one minus the documented spray gun transfer efficiency and by one minus the documented filtration system control efficiency when control equipment will be applied to such emissions.
- TAP content (lb/gal) of a coating is specified on the Safety Data Sheet (SDS) for that coating, or shall be calculated by multiplying the weight percentage of TAP (%) by the density (lb/gal) of the coating from the SDS.
- For TAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the TAP content is listed as below detection on SDS or other documentation, the TAP content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.
- When the TAP content cannot be determined from SDS or other documentation, the TAP content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.

[9/27/2018]

### 3.9 Demonstrate Coating TAP Compliance

For each Daily Coating Usage Scenario, the permittee shall estimate TAP emissions and compare against the TAP Screening Emission Rates or Modeled Concentration Limits in Table 3.5:

- The permittee shall compare estimated TAP emissions for all coatings against the Screening Emission Rates in Table 3.5. For emissions equal or less than the Screening Emission Rate, modeling analyses is not required. For emissions in excess of the Screening Emission Rate, modeling analyses is required to determine the maximum modeled concentration.
- Modeled emissions from all coating operations for a Daily Coating Usage Scenario shall not exceed the Modeled Concentration Limits in Table 3.5. The permittee shall not use or implement any Scenario that exceeds a Modeled Concentration Limit.
- All modeling analyses shall use EPA-approved models and follow relevant guidance in the most recent version of the “State of Idaho Guideline for Performing Air Quality Impact Analyses,” available for download at DEQ’s website.

Table 3.5 TAP Screening Emission Rates and Modeled Concentration Limits

TAP	CAS	Particulate?	Screening Emission Rate (lb/day) <sup>(a)</sup>	Modeled Concentration Limit (mg/m <sup>3</sup> )
Acetone	67-64-1	No	2856	89
Acrylamide	79-06-1	No	0.0001224	0.00000077
Aluminum - Metal and Oxide	7429-90-5	Yes	16.008	0.5
Aluminum - Soluble Salts	7429-90-5	Yes	3.192	0.1
n-Amyl Acetate	628-63-7	No	847.2	26.5
Antimony & Compounds, as Sb	7440-36-0	Yes	0.792	0.025
Barium (Soluble Compounds), as Ba	7440-39-3	Yes	0.792	0.025
Benzene	71-43-2	No	0.0192	1.20E-04
Benzoyl peroxide	94-36-0	No	7.992	0.25
Bis (2-Ethylhexyl) Phthalate (DEHP)	117-81-7	No	0.672	0.0042
2-Butoxyethanol	111-76-2	No	192	6
2-Butoxyethyl Acetate	112-07-2	No	199.92	1.25
n-Butyl Acetate	123-86-4	No	1135.2	35.5
n-Butyl Alcohol	71-36-3	No	240	7.5
Calcium Carbonate	1317-65-3	Yes	16.008	0.5
Carbon Black	1333-86-4	Yes	5.52	0.175
Carbon Tetrachloride	56-23-5	No	0.01056	0.067
Chromium Metal, Chromium (III) Compounds as Cr	7440-47-3, 16065-83-1	Yes	0.792	0.025
Cumene	98-82-8	No	391.2	12.25
Cyclohexane	110-82-7	No	1680	52.5
Cyclohexanone	108-94-1	No	160.08	5
Diacetone Alcohol	123-42-2	No	384	12
Dibutyl Phthalate	84-74-2	No	7.992	0.25
1,4-Dichlorobenzene	106-46-7	No	720	22.5
o-Dichlorobenzene	95-50-1	No	480	15
Diethyl Phthalate	84-66-2	No	7.992	0.25
Diisobutyl Ketone	108-83-8	No	232.08	7.25
Dimethylphthalate	131-11-3	No	7.992	0.25
Dipropylene Glycol Methyl Ether	34590-94-8	No	960	30
2,6-Di- <i>tert</i> -butyl-p-cresol (butylated hydroxytoluene)	128-37-0	No	16.008	0.5
Ethyl Acetate	141-78-6	No	2239.2	70
Ethyl Alcohol	64-17-5	No	3000	94
Ethyl Benzene	100-41-4	No	696	21.75
Ethylene Glycol Vapor	107-21-1	No	20.304	6.35
Formaldehyde	50-00-0	No	0.01224	7.70E-05

Heptane (n-Heptane)	142-82-5	No	2616	82
Hexamethylene Diisocyanate	822-06-0	No	0.048	0.0015
Hexane (n-Hexane)	110-54-3	No	288	9
Hydroquinone	123-31-9	No	3.192	0.1
Iron Oxide Fume (Fe <sub>2</sub> O <sub>3</sub> ) as Fe	1309-37-1	Yes	7.992	0.25
Isobutyl Acetate	110-19-0	No	1120.8	35
Isobutyl Alcohol	78-83-1	No	240	6
Isophorone Diisocyanate	4098-71-9	No	0.144	0.0045
Isopropyl Alcohol	67-63-0	No	1567.2	49
Isopropyl Acetate	108-21-4	No	1663.2	52
Kaolin	1332-58-7	Yes	3.192	0.1
Manganese as Mn, Dust & Compounds	7439-96-5	Yes	7.992	0.25
Magnesite	546-93-0	Yes	16.008	0.5
Methacrylic Acid	79-41-4	No	112.08	3.5
Methanol	67-56-1	No	415.2	13
1-Methoxy-2-Propanol Acetate	108-65-6	No	576	3.6
2-Methoxyethyl Acetate	110-49-6	No	38.4	1.2
Methyl Acetate	79-20-9	No	976.8	30.5
Methyl n-Amyl Ketone	110-43-0	No	376.8	11.75
Methyl Chloroform	71-55-6	No	3048	95.5
Methyl Ethyl Ketone (MEK)	78-93-3	No	943.2	29.5
Methyl Isoamyl Ketone	110-12-3	No	384	12
Methyl Isobutyl Carbinol	108-11-2	No	166.32	5.2
Methyl Isobutyl Ketone (MIBK)	108-10-1	No	328.8	10.25
Methyl Methacrylate	80-62-6	No	655.2	20.5
Methylene Chloride	75-09-2	No	0.0384	2.40E-04
Methylene Diisocyanate (MDI)	101-68-8	No	0.072	0.0025
Methyl Propyl Ketone	107-87-9	No	1120.8	35
Mica (Respirable Dust)	12001-26-2	Yes	4.8	0.15
Molybdenum as Mo	7439-98-7	Yes	7.992	0.25
Naphthalene	91-20-3	No	79.92	2.5
Nickel	7440-02-0	Yes	0.000648	4.20E-06
Nonane	111-84-2	No	1680	52.5
Pentane	109-66-0	No	2832	88.5
Phenol	108-95-2	No	30.48	0.95
Phosphoric Acid	7664-38-2	No	1.608	0.05
Propionic Acid	79-09-4	No	48	1.5
n-Propyl Acetate	109-60-4	No	1344	42
Propyl Alcohol	71-23-8	No	799.2	25
Selenium	7782-49-2	Yes	0.312	0.01

Silica – Amorphous, including: • Diatomaceous Earth (uncalcined) • Precipitated Silica • Silica Gel	61790-53-2 112926-00-8	Yes	16.008	0.5
Silica - Crystalline - Cristobalite	14464-46-1	Yes	0.0792	0.0025
Silica - Crystalline Quartz & Fused Silica	14808-60-7	Yes	0.1608	0.005
Stoddard Solvent	8052-41-3	No	840	26.25
Styrene	100-42-5	No	160.08	1
Tetrahydrofuran	109-99-9	No	943.2	29.5
Toluene	108-88-3	No	600	18.75
Triethylamine	121-44-8	No	6.48	0.2
Trimethyl Benzene (Mixed and Individual Isomers)	25551-13-7	No	196.8	6.15
Vinyl Acetate	108-05-4	No	55.2	1.75
VM&P Naphtha	8032-32-4	No	2191.2	68.5
Xylene (o-, m-, p-isomers)	1330-20-7	No	696	21.75
Zinc	7440-66-6	Yes	16.008	0.5
Zinc Oxide Dust	1314-13-2	Yes	16.008	0.5

- a) Worst-case pounds of emissions from all coating operations (combined) per day, as calculated using procedures in this permit to estimate TAP emissions, or as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.
- b) Milligrams of toxic air pollutant (TAP) per cubic meter, modeling proposed emission rates calculated using a daily averaging period.

[9/27/2018]

### 3.10 Demonstrate Coating Emission Limit Compliance

For each Daily Coating Usage Scenario, emissions from all coating operations shall be estimated and compared against the Coating Emission Limits in Table 3.2:

- PM<sub>10</sub>/PM<sub>2.5</sub> emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the solids content (lb/gal) of that coating, and summing the total emissions from all coatings (lb/day). Emissions may also be multiplied by one minus the transfer efficiency and by one minus the filter control efficiency when control equipment will be applied to such emissions.
- VOC emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the VOC content (lb/gal) for that coating material, and summing the total emissions from all coating materials (lb/day).
- HAP emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the HAP content (lb/gal) for each coating material, and summing the total emissions from all coating materials (lb/day).
- For solids content, VOC content, and HAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the solids content, VOC content, or HAP content is listed as below detection on SDS or other documentation, the HAP content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.
- When the solids content, VOC content, or HAP content cannot be determined from SDS or other documentation, the content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.

- The permittee shall compare estimated emissions for all coating materials against the Coating Emission Limits in Table 3.2. The permittee shall not use or implement any Scenario that exceeds a Coating Emission Limit.

[9/27/2018]

## **Monitoring, Recordkeeping, and Reporting Requirements**

### **3.11 Coating Usage Scenario Monitoring**

Each calendar day on which coating materials are used, the permittee shall select and record the Daily Coating Usage Scenario that will be used for that day, and comply with the maximum daily coating usage limits specified for the selected Scenario.

- Only one Daily Coating Usage Scenario may be used each calendar day.
- The permittee shall not exceed any daily coating usage limit for the Scenario chosen that calendar day.
- The permittee shall maintain documentation such as coating material SDS, manufacturer's specification sheets that support filter control efficiencies, transfer efficiencies, capture efficiencies, and other engineering assumptions relied upon in emission calculations.

[9/27/2018]

### **3.12 Coating Material Usage Recordkeeping**

Each calendar day on which coating materials are used, the permittee shall collect and maintain records of the quantity of each material used, including but not limited to primers, basecoats, hardeners, accelerators, thinners, solvents, and powder coatings to demonstrate compliance with Approved or Alternate Daily Coating Usage Limits.

[9/27/2018]

### **3.13 Coating Material Purchase and Safety Data Sheet Recordkeeping**

For each coating material used at the facility, including but not limited to primers, basecoats, hardeners, accelerators, thinners, solvents, and powder coatings, the permittee shall record and maintain the following records:

- Material purchase records
- Safety Data Sheets (SDS)

### **3.14 Coating Usage Scenario Reporting**

Each year, the permittee shall submit a report by May 1st on all Daily Coating Usage Scenarios used each calendar day during the previous 365-day period. The report shall include documentation supporting the TAP compliance demonstrations and the Coating Emission Limit compliance demonstrations relied upon for each Daily Coating Usage Scenario, and any modeling analyses conducted in each coating TAP compliance demonstration. Documentation should be in sufficient detail, including documentation of all calculations and electronic copies of modeling files, such that DEQ can verify the analysis. The report shall be titled "Permit-Required TAP Compliance Report" and shall be sent to:

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

[9/27/2018]

## 4 Fabrication

### 4.1 Process Description

Welding is performed in the welding shop at two Lincoln Electric welding booths, one unenclosed manual welding booth, and several manual welders. The manual welders include four Millermatic 350P, five Millermatic 252, two Millermatic 251, and one Miller Invision 352 Mpa with D74 Mpa Plus wire feeder. Since the nearby roll-up doors are generally closed, all welding fumes generated in the area are assumed to vent out of the building through three vents mounted on the south wall of the welding shop.

Steel, stainless steel and aluminum cutting using laser cutters occur in the steel bay. There are two enclosed TRUMPF laser metal cutting lathes. Emissions from laser cutters are controlled with a TRUMPF Micropore filter at each of the laser cutting operations.

Plasma cutting is performed using a Hypertherm 65 Plasma cutter (with water table) in plasma notch at In the Ditch. The plasma cutter at the facility is only used to cut steel tubing.

Cutting of steel, stainless steel and aluminum tubes and rods using metals saws occur in the Breezeway room using two dry-cutting metal saws and one smaller R&D metal saw. Emissions from these metal saws are vented indoors at insignificant rates and are therefore not regulated.

### 4.2 Control Device Descriptions

**Table 4.1 Fabrication Description**

Emissions Units/Processes	Control Devices	Emission Points
Welding	None	Welding room vents
Plasma Cutting	None	P1 vent
Laser cutting	TRUMPF Micropore Fileter	Laser cutting room doors

## Emission Limits

### 4.3 Emission Limits

The emissions from the fabrication stacks or vents shall not exceed any corresponding emissions rate limits listed in Table 4.2.

**Table 4.2 Fabrication Emission Limits <sup>(a)</sup>**

Source Description	PM <sub>10</sub> <sup>(b)</sup>		HAP/TAP Cr6+		HAP/TAP Ni	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
Welding	0.07	0.30	5.6E-07	3.2E-04	2.7E-05	2.3E-04
Plasma Cutting	--	--				
Laser cutting	--	--				

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.

[9/27/2018]

## Operating Requirements

### 4.4 Welding Wire Usage and Welding Process

- The permittee shall use the welding wires and welding processes as specified in Table 4.3.
- In any calendar week, the welding wire usage of Hobart ER4043, 404304712P or equivalent, Hobart ER4043, 404304723L or equivalent, Hobart Premier Arc 6 or equivalent, and Lincoln Electric SuperArc L56 or equivalent shall not exceed the weekly limits listed in Table 4.3.
- For the purposes of Table 4.3, “or equivalent” is defined as that a HAP and TAP content of a new welding wire is equal to or less than the HAP and TAP content, as listed in the SDS, of the respective welding wire listed in Table 4.3.

**Table 4.3 Welding Wires Throughput Limits**

Welding Wire	Throughput Limits
Hobart ER4043, 404304712P or equivalent	60.0 lb/week
Hobart ER4043, 404304723L or equivalent	37.2 lb/week
Hobart Premier Arc 6 or equivalent	685.2 lb/week
Lincoln Electric SuperArc L56 or equivalent	277.2 lb/week

[9/27/2018]

### 4.5 Plasma Cutting Operating Hours

Plasma cutter operating hours shall not exceed 27 hours per week.

[9/27/2018]

### 4.6 Laser Cutting Operating Hours

Laser cutter operating hours shall not exceed 72 hours per week for each laser cutter.

[9/27/2018]

## Monitoring and Recordkeeping Requirements

### 4.7 Records of Welding Wire and Welding Process

The permittee shall monitor and record weekly, for each welding wire, the welding wire type, welding wire product name and model, the welding wire weekly usage, in pounds, and the corresponding welding process.

[9/27/2018]

### 4.8 Records of Laser and Plasma Cutting Operations

The permittee shall monitor and record weekly, for laser and plasma cutting, the hours of operation for each process.

[9/27/2018]

## 5 General Provisions

### General Compliance

- 5.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)
- [Idaho Code §39-101, et seq.]
- 5.2 The permittee shall at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
- [IDAPA 58.01.01.211, 5/1/94]
- 5.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.
- [IDAPA 58.01.01.212.01, 5/1/94]

### Inspection and Entry

- 5.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
  - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108]

### Construction and Operation Notification

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

- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

## Performance Testing

**5.7** If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

**5.8** All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

**5.9** Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

## Monitoring and Recordkeeping

**5.10** The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

## **Excess Emissions**

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

[IDAPA 58.01.01.130–136, 4/5/00]

## **Certification**

- 5.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

## **False Statements**

- 5.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

## **Tampering**

- 5.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

## **Transferability**

- 5.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

## **Severability**

- 5.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]