

Statement of Basis

**Permit to Construct No. P-2010.0144
Project ID 60978**

**Lippert Components, Inc
Twin Falls, Idaho**

Facility ID 083-00100

Final

September 21, 2012

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Permit Writer



The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

Btu	British thermal units
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
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
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
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
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
VOC	volatile organic compounds

FACILITY INFORMATION

Description

Lippert Components, Inc (formerly Dexter Chassis Group) manufactures trailers and trailer equipment. Trailer Chassis are welded together and components of the chassis are spray coated with a HAP free material. All coating is performed within a paint booth equipped with a fabric filtration system. The facility is also equipped with three space heating units. Welding is performed using an E70S wire rod and approximately 3,000 lbs of welding wire is used annually.

Paint Booth Operations

Lippert Components, Inc operates one paint booth.

Paint Booth No. 1:

Paint booth No. 1 has been in operation since 2007. This is the original booth used for painting operations by Lippert Components, Inc. The booth uses a pressure pump system with a high-volume, low-pressure (HVLP) spray gun with a transfer efficiency of 65%. This paint booth has one exhaust stack.

Natural Gas-Fired Space Heaters

Natural gas-fired heaters were installed at Lippert Components, Inc at time of construction of the facility. One is an office Heating Unit with a maximum rating of 69,000 Btu/hr. The other two are process units within the spray booth that produce warm air. The capacity of these two units is 1.1 MMBtu/hr each.

Welding Operations

Welding operations are a component of the manufacturing operations at Lippert Components, Inc. Lippert Components, Inc uses a welding process identified as gas metal arc welding. Welding of steel tubing uses a specific steel core wire (electrode) and rod material. Aluminum welding uses a specific aluminum welding wire (electrode) and rod material. An E70S wire rod is used and approximately 3,000 lbs of welding wire is used annually.

Permitting History

The following 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).

October 7, 2011	P-2010.0144 Project 60931 Change of name and ownership
April 6, 2011	P-2010.0144 Project 60614, Initial PTC was issued, (A) becomes S upon permit issuance.
March 13, 2008	X-2008.0016, Exemption Concurrence was issued for facility, It was determined that the exemption was issued erroneously and was therefore rescinded on September 14, 2010. Although the concurrence was rescinded, Dexter Chassis' actual and potential emissions were always below exempt levels. At no time did Dexter Chassis operate out of compliance with Idaho air permitting rules.
September 21, 2012	P-2010.0144 Project 60978, increase daily usage of product, Permit status (A) upon issuance of this permit.

Application Scope

This PTC is for a minor modification at an existing minor facility. The applicant has proposed to:

- Modify the initial PTC by an increase the daily paint limit from 18 gallons per day to 50 gallons per day using the same products that established the initial PTC or the equivalent.

Application Chronology

December 29, 2011 DEQ received an application and an application fee.

January 17, – February 1, 2012 DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.

February 7, 2012 DEQ determined that the application was complete.

March 23, 2012 DEQ made available the draft permit and statement of basis for peer and regional office review.

April 2, 2012 DEQ made available the draft permit and statement of basis for applicant review.

September 5, 2012 DEQ received the permit processing fee.

September 19, 2012 DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment	Emission Point ID No.
Paint Booth	<u>Paint Booth:</u> Manufacturer: VOC Containment Systems Model: AA-4 U VRC Air Flow Type: Side Draft Manufacture Date: October 2007	<u>Paint Booth Filtration System:</u> Manufacturer: Kem-Wove Model: SPS 1.0 Type: Fabric Filter Number of filters: 46 PM ₁₀ control efficiency no less than: 99.4%	<u>Paint Booth Exhaust</u> Exit height: 30 ft Exit diameter: 2.83 ft Exit flow rate: 12,000 acfm Exit temperature: 180°F
Heating Units	<u>Space Heaters</u> Two heaters with a heat input of 1.1 MMBtu/hr One heater with a heat input of 69,000 Btu/hr	N/A	3 Space heater outlets
Welding	Electric Arc Welding Rod: E70S Type: GMAW Lbs wire: 3,000 lb/yr	NA	Fugitive

Emissions Inventories

An emission inventory was developed for the paint booth, three natural-gas fired heaters and welding operations at the facility (see Appendix A) associated with this proposed project. Emissions estimates of criteria pollutant PTE were based on emission factors from AP-42, Tables 12.19-2 for all welding operations. AP-42, Table 1.4-3, was used to establish emission estimates for the space heaters. These calculations assume 8,760 hours per year operating of the heating units. Coatings estimates assume a maximum of 50 gals/day. Summaries of the estimated uncontrolled and controlled emissions of criteria pollutants, TAPs, and HAPs from the facility are provided in the following tables.

Pre-Project Potential to Emit

The following table presents the pre-project potential to emit for all criteria and GHG pollutants from all emissions units at the facility and for the one unit being modified as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 2 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO ₂ e	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Paint Booth	0.05	0.1	0.00	0.00	0.00	0.00	0.00	0.00	0.08	3.42	N/A	N/A
Heating Units	0.017	0.074	1.33E-03	5.85E-03	0.222	0.974	0.187	0.818	0.0122	0.0536	N/A	N/A
Welding Operations	N/A	0.0078	N/A	N/A								
Pre-Project Totals	0.07	0.18	1.33E-03	5.85E-03	0.22	0.97	0.19	0.82	0.09	3.47	N/A	N/A

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

Post Project Potential to Emit

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

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

Table 3 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO ₂ e	
	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)	lb/hr ^(a)	T/yr ^(b)
Paint Booth	0.068	0.298	N/A	N/A	N/A	N/A	N/A	N/A	2.43	10.64	N/A	N/A
Heating Units	0.05	0.01	1.33E-03	5.85E-03	0.222	0.974	0.187	0.818	0.122	0.0536	N/A	N/A
Welding Operations	0.017	0.074	N/A	N/A								
Post Project Totals	0.14	0.38	1.33E-03	5.85E-03	0.22	0.97	0.19	0.82	2.55	10.69	0.00	0.00

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

Change in Potential to Emit

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

Table 4 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	PM ₁₀ /PM _{2.5}		SO ₂		NO _x		CO		VOC		CO ₂ e	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	0.07	0.18	1.33E-03	5.85E-03	0.22	0.97	0.19	0.82	0.81	3.47	N/A	N/A
Post Project Potential to Emit	0.14	0.38	1.33E-03	5.85E-03	0.22	0.97	0.19	0.82	2.55	10.69	N/A	N/A
Changes in Potential to Emit	0.07	0.20	0.00	0.00	0.00	0.00	0.00	0.00	1.74	7.22	N/A	N/A

Non-Carcinogenic TAP Emissions

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

Pre- and post-project, as well as the change in, non-carcinogenic TAP emissions are presented in the following table:

Table 5 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS

Non-Carcinogenic Toxic Air Pollutants	Pre-Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Post Project 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Change in 24-hour Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
Barium	9.79E-06	9.79E-06	0.00	3.30E-02	No
Carbon Black	3.00E-04	3.00E-04	0.00	0.23	No
Chromium	3.74E-06	3.74E-06	0.00	3.30E-02	No
Cobalt	8.12E-07	8.12E-07	0.00	3.30E-02	No
Copper	1.89E-06	1.89E-06	0.00	1.30E-02	No
Hexane	4.00E-03	4.00E-03	0.00	12	No
Manganese	1.99E-04	1.99E-04	0.00	6.7E-02	No
Mercury	5.78E-07	5.78E-07	0.00	3.00E-03	No
Molybdenum	2.45E-06	2.45E-06	0.00	0.333	No
Napthalene	4.95E-04	4.95E-04	0.00	3.33	No
Selenium	5.34E-08	5.34E-08	0.00	1.30E-02	No
Toluene	7.56E-06	7.56E-06	0.00	25	No
Vanadium	5.12E-06	5.12E-06	0.00	3.00E-03	No
Zinc	6.45E-05	6.45E-05	0.00	0.667	No

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

Carcinogenic TAP Emissions

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

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

Carcinogenic Toxic Air Pollutants	Pre-Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Post Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Change in Annual Average Emissions Rates for Units at the Facility (lb/hr)	Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
2-Methylnapthalene	5.34E-08	5.34E-08	0.0000	9.1E-05	No
3-Methylchloranthrene	4.00E-09	4.00E-09	0.0000	2.50E-06	No
Acenaphthene	4.00E-09	4.00E-09	0.0000	9.1E-05	No
Acenaphthylene	4.00E-09	4.00E-09	0.0000	9.1E-05	
Anthracene	5.34E-09	5.34E-09	0.0000	9.1E-05	No
Benzo(g,h,i) perylene	2.67E-09	2.67E-09	0.0000	9.1E-05	No
Dichlorobezene	2.67E-06	2.67E-06	0.0000	9.1E-05	No
Fluoranthene	6.67E-09	6.67E-09	0.0000	9.1E-05	No
Fluorene	6.23E-09	6.23E-09	0.0000	9.1E-05	No
Napthalene	1.26E-06	1.26E-06	0.0000	9.1E-05	No
Polycyclic Organic Matter	2.54E-08	2.54E-08	0.0000	2.00E-06	No
Phenanathrene	3.78E-08	3.78E-08	0.0000	9.1E-05	No
Pyrene	1.1E-08	1.1E-08	0.0000	9.1E-05	No
Benzene	4.67E-06	4.67E-06	0.0000	8.00E-04	No
Formaldehyde	1.67E-04	1.67E-04	0.0000	5.10E-04	No
Arsenic	4.45E-07	4.45E-07	0.0000	1.50E-06	No
Beryllium	2.67E-08	2.67E-08	0.0000	2.80E-05	No
Cadmium	2.45E-06	2.45E-06	0.0000	3.70E-06	No
Nickel	5.3E-06	5.3E-06	0.0000	2.70E-05	No

a) Polycyclic Organic Matter (POM) is considered as one TAP comprised of: benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenzo(a,h)anthracene, chrysene, indeno(1,2,3-cd)pyrene, benzo(a)pyrene. The total is compared to benzo(a)pyrene.

None of the PTEs for carcinogenic TAP were exceeded as a result of this project. Therefore, modeling is not required for any carcinogenic TAP because none of the annual average carcinogenic screening ELs identified in IDAPA 58.01.01.586 were exceeded.

Post Project HAP Emissions

The following table presents the post project potential to emit for HAP pollutants from all emissions units at the facility as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations of these emissions for each emissions unit.

Table 7 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY

Hazardous Air Pollutants	PTE (T/yr)
2-Methylnaphthalene	5.34E-08
3-Methylchloranthrene	4.00E-09
7,12 – Dimethylbenz(a)anthracene	1.56E-07
Acenaphthene	4.00E-09
Acenaphthylene	4.00 E-09
Anthracene	5.34E-09
Benzo(g,h,i) perylene	2.67E-09
Dichlorobenzene	2.67E-09
Fluoranthene	6.67E-09
Fluorene	6.23E-09
Naphthalene	2.17E-03
Polycyclic Organic Matter	2.54E-08
Phenanthrene	3.78E-08
Pyrene	1.11E-08
Benzene	4.67E-06
Formaldehyde	1.67E-04
Hexane	1.75E-02
Toluene	3.31E-05
Arsenic	4.45E-07
Beryllium	4.29E-05
Cadmium	2.45E-06
Chromium	1.36E-05
Cobalt	8.18E-07
Manganese	3.70E-06
Mercury	2.53E-06
Nickel	4.67E-06
Selenium	2.34E-07
Totals	2.00E-02

Ambient Air Quality Impact Analyses

No modeling requirements were necessary for this project. Facility-wide controlled emissions were below all modeling thresholds. A detailed discussion can be found in Appendix A.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Twin Falls County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The facility has an uncontrolled potential to emit for PM₁₀, PM_{2.5}, SO₂, NO_x, CO, and VOC emissions are less than the Major Source thresholds of 100 T/yr for each pollutant. In addition, the facility has uncontrolled potential HAP emissions of less than the Major Source threshold of 10 T/yr and for all HAP combined less than the Major Source threshold of 25 T/yr. Therefore, this facility is not designated as a Synthetic Minor facility.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201 Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the increase in coatings limit to 50 gallon per day. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200–228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 Tier II Operating Permit

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

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 Visible Emissions

The sources of PM₁₀ emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 8.

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

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM₁₀, SO₂, NO_x, CO, VOC, or 10 tons per year for any one HAP or 25 tons per year for all HAP combined (list HAP or HAP) as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

As presented in the prior tables the PTE for each criteria pollutant is less than 100 T/yr. Therefore, this facility is not a criteria pollutant Major Source subject to Tier I requirements.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

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

NSPS Applicability (40 CFR 60)

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

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

Lippert Component Inc. stated in their submitted application nothing has changed from the initial PTC except having the daily paint usage increased to 50 gallons per day from the previous permit limit of 18 gallons per day. Lippert Component Inc. did not state they had applied and received from EPA the exemption from 40 CFR 63, Subpart HHHHHH.

Lippert Component Inc. asserted in their submittal for their initial PTC that the facility was not subject to 40 CFR 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. They cited the definition of Motor Vehicle or mobile equipment. They are stating that this excludes mobile equipment parts or subassemblies at a vehicle assembly plant or parts manufacturing plant. §63.11180 defines mobile equipment as “any device that may be drawn and/or driven on a roadway including, but not limited to, heavy-duty trucks, truck trailers, fleet delivery trucks, buses, mobile cranes, bulldozers, street cleaners, agriculture equipment, motor homes, and other recreational vehicles (including camping trailers and fifth wheels).” Also, according to the definition at §63.11180, mobile equipment surface coating does not include surface coating of mobile equipment subassemblies at a vehicle assembly plant. On the surface it would appear that Lippert Component Inc. is not subject to the Subpart. However, EPA has stated that if a unit is typically drawn on a roadway during travel to the final point of installation, it would be considered mobile equipment under the rule. With that in mind, DEQ has included the Subpart requirements in the permit. This was concluded for two reasons. First, per a June 20, 2010 EPA delegation letter, the Idaho DEQ does not have delegation of Subpart HHHHHH. Therefore, the final decision regarding applicability falls under the EPA’s jurisdiction. Secondly, Lippert Component Inc. does not currently use any coating materials that contain any of the target HAPs defined in the Subpart. Therefore, they may petition the EPA to either decide whether they are subject to the Subpart or request an exemption. The language DEQ has included in each permit condition has a caveat built in to account for Lippert Component Inc.’s ability to obtain an exemption from EPA. Once EPA makes a decision regarding applicability or the exemption, those conditions may become unenforceable per the caveat language included in the conditions.

The facility has proposed to operate as a minor source of hazardous air pollutant (HAP) emissions, and is subject to the requirements of 40 CFR 63, Subpart HHHHHH–National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.

40 CFR 63, Subpart HHHHHH

**National Emission Standards for Hazardous Air Pollutants:
Paint Stripping and Miscellaneous Surface Coating
Operations at Area Sources**

§ 60.11169

What is the purpose of this subpart?

In accordance with §63.11169, subpart HHHHHH establishes national emission standards for hazardous air pollutants (HAP) for area sources involved in auto body refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations.

§ 63.11170 Am I subject to this subpart?

In accordance with §63.11170(a), this automotive coating operation is subject to this subpart because the facility will be operated as an area source of HAP. The facility is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. In addition, the facility will perform one or more activities listed in this section, including spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations.

§ 63.11171 How do I know if my source is considered a new source or an existing source?

In accordance with §63.11171(b), the automotive coating operation is the collection of mixing rooms and equipment; spray booths, curing ovens, and associated equipment; spray guns and associated equipment; spray gun cleaning equipment; and equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint. Paint stripping was not proposed as a business activity.

In accordance with §63.11171(c), this automotive coating operation is a new source because it will commenced construction after September 17, 2007, by installing new paint stripping or surface coating equipment, and the new surface coating equipment will be used at a source that was not actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007. The paint booth was manufactured in October 2007 and was therefore constructed and installed after September 17, 2007.

§ 63.11172 When do I have to comply with this subpart?

In accordance with §63.11172(a)(1), because the initial startup of the facility occurred prior to January 9, 2008, and the facility is considered "new", the compliance date was January 9, 2008.

§ 63.11173 What are my general requirements for complying with this subpart?

Because the facility has not proposed paint-stripping activities, the requirements of §63.11173(a) through (f) are not applicable. Because the facility is an automotive coating operation, in accordance with §63.11173(e), the permittee must meet the requirements of in paragraphs (e)(1) through (e)(5) of this section.

In accordance with §63.11173(f), each owner or operator of an affected automotive coating operation must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in §63.11180, are trained in the proper application of surface coatings as required by paragraph (e)(1) of this section. The training program must include, at a minimum, the items listed in paragraphs (f)(1) through (f)(3) of this section.

In accordance with §63.11173(g), as required by paragraph (e)(1) of this section, all new and existing personnel at an affected motor vehicle and mobile equipment or miscellaneous surface coating source, including contract personnel, who spray apply surface coatings, as defined in §63.11180, must be trained by the dates specified in paragraphs (g)(1) and (2) of this section. Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.

Compliance with these requirements is assured by permit condition 22.

§ 63.11174 What parts of the General Provisions apply to me?

In accordance with §63.11174(a), Table 1 of this subpart shows which parts of the General Provisions in subpart A apply. Compliance with these requirements is assured by permit condition 22.

In accordance with §63.11174(b), an owner or operator of an area source subject to this subpart is exempt from the obligation to obtain a permit under 40 CFR part 70 or 71 provided that a permit under 40 CFR 70.3(a) or 71.3(a) is not required for a reason other than becoming area source subject to this subpart. This permit application and permitting action involve a Permit to Construct, and will not utilize the requirements and procedures in IDAPA 58.01.01.300-399 for the issuance of Tier I operating permits.

§ 63.11175 What notifications must I submit?

In accordance with §63.11175(a), because the facility is a surface coating operation subject to this subpart, the initial notification required by §63.9(b) must be submitted. For this new operation, the Initial Notification must be submitted no later than 180 days after initial startup.

In accordance with §63.11175(b), because the facility is a new source, the permittee is not required to submit a separate notification of compliance status in addition to the initial notification specified in paragraph (a) of this subpart provided the permittee was able to certify compliance on the date of the initial notification, as part of the initial notification, and the permittee's compliance status has not since changed. The permittee must submit a Notification of Compliance Status on or before March 11, 2011. The permittee is required to submit the information specified in paragraphs (b)(1) through (4) of this section with the Notification of Compliance Status.

Compliance with these requirements is assured by permit condition 26.

§ 63.11176 What reports must I submit?

In accordance with §63.11176(a), because the permittee is an owner or operator of a paint stripping, motor vehicle or mobile equipment, or miscellaneous surface coating affected source, the permittee is required to submit a report in each calendar year in which information previously submitted in either the initial notification required by §63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted under this paragraph, has changed. Deviations from the relevant requirements in §63.11173(a) through (d) or §63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the information specified in paragraphs (a)(1) through (2) of this section.

Compliance with these requirements is assured by permit condition 27.

Because the facility has not proposed to conduct paint stripping operations, the MeCl minimization plan requirements are not applicable (see permit condition 14).

§ 63.11177 What records must I keep?

In accordance with §63.11177, because the permittee is the owner or operator of a surface coating operation, the permittee must keep the records specified in paragraphs (a) through (d) and (g) of this section. Because the permittee has not proposed to conduct paint stripping operations, the requirements of paragraphs (e) and (f) of this section are not applicable. Compliance with these requirements is assured by permit condition 23.

§ 63.11178 In what form and for how long must I keep my records?

In accordance with 40 CFR 63.11178(a) because the permittee is the owner or operator of an affected source, the permittee must maintain copies of the records specified in §63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period. Compliance with these requirements is assured by permit condition 23.

§ 63.11179 Who implements and enforces this subpart?

In accordance with §63.11179(a), this subpart can be implemented and enforced by the U.S. Environmental Protection Agency (EPA), or a delegated authority. At the time of this permitting action, the EPA has not delegated authority to the State of Idaho. However, IDAPA 58.01.01.107.03.i incorporates by reference all Federal Clean Air Act requirements including 40 CFR 63, Subpart HHHHHH. Therefore, the requirements of this subpart have been placed in the permit.

§ 63.11180 What definitions do I need to know?

Terms used in this subpart are defined in accordance with §63.11180.

Permit Conditions Review

This section describes the permit conditions for this initial permit or only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Existing Permit Condition 5

- The emissions from the paint booth exhaust stack shall not exceed any emissions rate limit in the following table.

Table 2 PAINT BOOTH EXHAUST STACK EMISSION LIMITS ^(a)

Sources	PM ₁₀ ^(b)		VOC	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Paint Booth	.015	0.1	0.8	3.42

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

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. Worst case scenario used, 100 % weight per gallon was PM₁₀.

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.

Tons per any consecutive 12 calendar month period.

Revised to Permit Condition 7

The emissions from the paint booth exhaust stack shall not exceed any emissions rate limit in the following table.

Table 3 PAINT BOOTH EXHAUST STACK EMISSION LIMITS ^(a)

Sources	PM ₁₀ ^(b)		VOC	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Paint Booth	.068	.298	2.43	10.64

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

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. Worst case scenario used, 100 % weight per gallon was PM₁₀.

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.

Tons per any consecutive 12 calendar month period.

This permit condition has been revised to reflect the increase in PM₁₀ and VOC emissions created by increasing the daily usage of paint from 18 to 50 gallons per day.

Existing Permit Condition 6 was renumbered to New Permit Condition 9

Existing Permit Condition 7 was renumbered to New Permit Condition 8

Existing Permit Condition 8 was renumbered to New Permit Condition 10

Existing Permit Condition 9 was renumbered to New Permit Condition 11

Existing Permit Condition 10 was renumbered to New Permit Condition 12

Existing Permit Condition 11 was renumbered to New Permit Condition 13

Existing Permit Condition 12 was renumbered to New Permit Condition 14

Existing Permit Condition 13 was renumbered to New Permit Condition 15

Existing Permit Condition 14 was renumbered to New Permit Condition 16

Existing Permit Condition 15 was renumbered to New Permit Condition 17

Existing Permit Condition 16 was renumbered to New Permit Condition 18

Existing Permit Condition 17 was renumbered to New Permit Condition 19

Existing Permit Condition 18 was renumbered to New Permit Condition 20

Existing Permit Condition 19 was renumbered to New Permit Condition 21

Existing Permit Condition 20 was renumbered to New Permit Condition 22

Existing Permit Condition 21 was renumbered to New Permit Condition 23

Existing Permit Condition 22 was renumbered to New Permit Condition 24

Existing Permit Condition 23 was renumbered to New Permit Condition 25

Existing Permit Condition 24 was renumbered to New Permit Condition 26

Existing Permit Condition 25 was renumbered to New Permit Condition 27

General Provisions

Initial Permit Condition renumbered to PC 28

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

Initial Permit Condition renumbered to PC 29

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

Initial Permit Condition renumbered to PC 30

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

Initial Permit Condition renumbered to PC 31

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

Initial Permit Condition renumbered to PC 32

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

Initial Permit Condition renumbered to PC 33

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

Initial Permit Condition renumbered to PC 34

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

Initial Permit Condition renumbered to PC 35

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

Initial Permit Condition renumbered to PC 36

The performance test report provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

Initial Permit Condition renumbered to PC 37

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

Initial Permit Condition renumbered to PC 38

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

Initial Permit Condition renumbered to PC 39

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

Initial Permit Condition renumbered to PC 40

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

Initial Permit Condition renumbered to PC 41

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

Initial Permit Condition renumbered to PC 42

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

Initial Permit Condition renumbered to PC 43

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

PUBLIC REVIEW

Public Comment Opportunity

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ's proposed action. The Opportunity for Public Comment dates were from January 17, 2012 to February 1, 2012.

APPENDIX A – EMISSIONS INVENTORIES

Lippert Components, Inc. - Twin Falls Calculations - Permit Request

Operational Data

a	Max Gallons of Paint Consumed (gal/day)	50
b	Max Gallons of Paint Consumed (a X 365)	18250
c	Hours per day	24
d	Paint Sprayed (24 hr average) (gal/hr)	2.08
e	Paint density (from MSDS)(lbs/gal)	9.34
f	Paint Sprayed (24 hr average) (lbs/hr)	19.46

Emission Calculations - Solids

g	Maximum possible solids(% by wt) (MSDS states 41.5%)	100
h	Max possible solids content (lbs/gal)	9.34
i	Paint solids transfer efficiency (%)	65
l	Percent of solids reaching filter (1-j)(%)	35
k	Paint filter efficiency (%)	99
l	Max possible PM emitted (lbs/hr 24 Hr-ave)	0.068

Emission Calculations - VOC

	Maximum possible volatile (% by wt)	2.48
	Max possible volatile content (lbs/gal)	1.17
	Max possible VOC emitted (lbs/hr 24 Hr-ave)	2.43
	Ton/year	10.64

Emission Calculations - Solid TAPs

	Solid TAP/HAP Content (% by wt) (carbon black 1333-86-4)	1.32
	Solid TAP/HAP Content (lbs/gal) (carbon black 1333-86-4)	0.12
q	Paint solids transfer efficiency (%)	65
	Percent of solids reaching filter (1-q)(%)	35
	Paint filter efficiency(%)	99

Modeling Criteria

Before Controls (lbs/hr)	After Controls (lbs/hr)	Emission Screening level (lbs/hr)
0.09	0.0005	0.23

Emission Calculations - Solid TAPs (From Welding)

	Chromium (AP-42 0.01lb/10,000 lbs wire)(15lbs wire/day max)	1.00E-06	6.25E-07	0.033
	Chromium IV (AP-42 No Data)			No Value
	Cobalt (AP-42 <0.01 lbs/10,000 lbs wire (15 lbs wire/day max)	1.00E-06	6.25E-07	0.0033
	Manganese (AP-42 3.18 lb.10,000 lbs wire (15 lbs wire/day max)	1.99E-04	1.99E-04	0.067
	Nickel (AP-42 0.01 lbs/10,000 lbs wire) (15 lbs wire /day max)	1.00E-06	6.25E-07	2.70E-05
	Lead (AP-42 No Data)			No Value

Emission Calculations - VOC TAPs

	VOC TAP/HAP Content (% by wt) (EGBG 111-76-2)	2.44	0.47	0.47	8
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Emission Calculations - VOC TAPs

	VOC TAP/HAP Content (% by wt) (DGME 34590-94-8)	1.73	0.34	0.34	8
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Emission Calculations - Fugitive Weld Fumes

	From AP-42: 3,000 lb weld wire/yr X 5.2 lbs fume/1,000 pound wire = pound fume /yr	15.6
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Emissions Inventory (Criteria Pollutants)

Emission Unit	PM10	SO2	NOx	CO	VOC	Lead
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources						
Paint Booth	2.98E-01	NA	NA	NA	10.64	NA
Heating Units	7.40E-02	5.85E-03	9.74E-01	8.18E-01	5.36E-02	4.87E-06
Welding Operations	1.42E-01	NA	NA	NA	NA	NA
Total	5.14E-01	5.85E-03	9.74E-01	8.18E-01	10.69	4.87E-06

Product and Usage Information

Product Name	Part Number	Density (lbs/gal)	VOC (% by wt)	PM (% by wt) (IDEQ assumes 100%)	Max Gallons/hr	Max lbs/hr	VOC lbs/hr	VOC T/yr PTE 8760 hours	VOC (lbs/gal)
Patriot HAPs Free W/R Enamel	6-kma-2010	9.34	12.48	100	2.08	19.46	2.43	10.64	1.17

PM10

Product Name	(a) PM sprayed (lbs)	(b) Overspray (1-TE)	(c) Filter Escape (1-FE)	PM Emissions (a) X (b) X (c)	PM T/yr PTE 8760 Hrs
Patriot HAPs Free W/R Enamel	19.46	0.35	0.01	0.068	0.298

Speciated (TAP)												
Product Name	TAP EGBG 111-76-2				TAP Carbon Black 1333-86-4				TAP DGME 34590-94-8			
	% by wt	PTE Emissions	lbs/hr	Emission Screening Level lbs/hr	% by wt	PTE Emissions	lbs/hr	Emission Screening Level lbs/hr	% by wt	PTE Emissions	lbs/hr	Emission Screening Level lbs/hr
Patriot HAPs Free W/R Enamel	2.44	2.08	0.47	8.00	1.32	2.36E-03	5.39E-04	0.23	1.73	1.47	0.34	40

APPENDIX B – PROCESSING FEE

PTC Fee Calculation

Instructions:

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

Company: Lippert Components Inc.
Address: 2703 College Avenue
City: Goshen
State: Indiana
Zip Code: 46528
Facility Contact: Erick Click
Title: Director SH&E Affairs
AIRS No.: 083-00100

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

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	0.0	0	0.0
SO ₂	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.198	0	0.0
VOC	7.32	0	0.0
TAPS/HAPS	0.0	0	0.0
Total:	7.52	0	0.0
Fee Due	\$ 2,500.00		

Comments:

A new source or modification to an existing source with increase of emissions of one (1) to less than ten (10) tons per year requires a Permit to Construct Processing Fee of \$2,500. IDAPA 58.01.01.225