

# **Statement of Basis**

**Tier I Operating Permit No. T1-2012.0067**

**Project ID 61131**

**Best Bath Systems, Inc.**

**Caldwell, Idaho**

**Facility ID 027-00103**

**Final**

**May 22, 2013**

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**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

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**APPENDIX A - EMISSIONS INVENTORY**

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## 1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	CO <sub>2</sub> equivalent emissions
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
m	meters
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 <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O <sub>2</sub>	oxygen
PC	permit condition
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
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>
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T1	Tier I operating permit
T2	Tier II operating permit
TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compound

## 2. INTRODUCTION AND APPLICABILITY

Best Bath Systems, Inc. (BBS) is a manufacturer of fiberglass tubs and showers, and is located at 723 Garber Street, Caldwell, Idaho 83605. 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 volatile organic compound (VOC) above the major source threshold of 100 tons-per-year. The facility is also classified as a major facility, as defined by Subsection 008.10.a, because it emits or has the potential to emit styrene above the major source thresholds of 10 tons-per-year for any single HAP and/or 25 tons-per-year for any combination of HAP.

As a major facility, Best Bath Systems, Inc. is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from Best Bath Systems, Inc. as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

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 Best Bath Systems, 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.

Best Bath Systems, Inc. Tier I operating permit is organized into sections. They are as follows:

### **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 sufficient to assure compliance with each permit condition follows the permit condition.

### **Sections 4 – Production of Bath Units (Stacks EF-9, EF-10, EF-11, EF-12, and EF-14)**

The emissions unit-specific sections of the permit contain the applicable requirements that specially 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. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately 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.

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by 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 sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws 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 the rule or permit, the rule or permit shall govern.

### 3. FACILITY INFORMATION

#### 3.1 Facility Description

Best Bath Systems, Inc. (BBS) is a fiberglass tub and shower manufacturer. The facility has seven General Emission Units, two make-up air units, and one spray booth associated with this Tier I application. Presented below is a copy of the description of the emission units as presented in the Tier I application.

##### EU7 – Resin Storage Room

Fiberglass resin is stored in two 5500 gallon capacity tanks in the Resin Storage Room, emission point EU7, located in the southwest corner of the building. The tanks sit inside secondary containment. The room is equipped with a roof-mounted ventilation fan. This centrifugal, up-blast exhaust fan, stack EF7, discharges vertically. The resin tanks are refilled via a supply truck. The resin is composed of styrene and unsaturated polyester polymer in a 35/65 wt% mix. Maximum daily styrene emissions from the room will occur when the tanks are refilled and styrene-saturated air is displaced from the tanks. There is no emission control equipment installed on the exhaust of the Resin Storage Room.

##### EU8 – Maintenance Room

The Maintenance Shop is used for miscellaneous equipment fabrication and repair. Maintenance Shop activities periodically require incidental welding. The exhaust fan in the Maintenance Shop is used to exhaust welding fumes but is primarily used to provide air flow for worker comfort. Make-up air to the Maintenance Shop is drawn in from outside, not from the production area. The maintenance shop pollutant emissions are assumed to be insignificant in comparison to the other facility emissions and are not included in the analysis.

##### EU9 – Lamination Area

BBS produces fiberglass shower and tub units primarily using spray layup techniques on open molds. Typically, three polyester-styrene layers are applied to molds to create the units: gel coat, barrier coat, and glass-reinforced resin. A fourth polymeric diisocyanate material, “blue foam,” is sprayed on to create reinforced floors. The first three layers are applied in the Lamination Area.

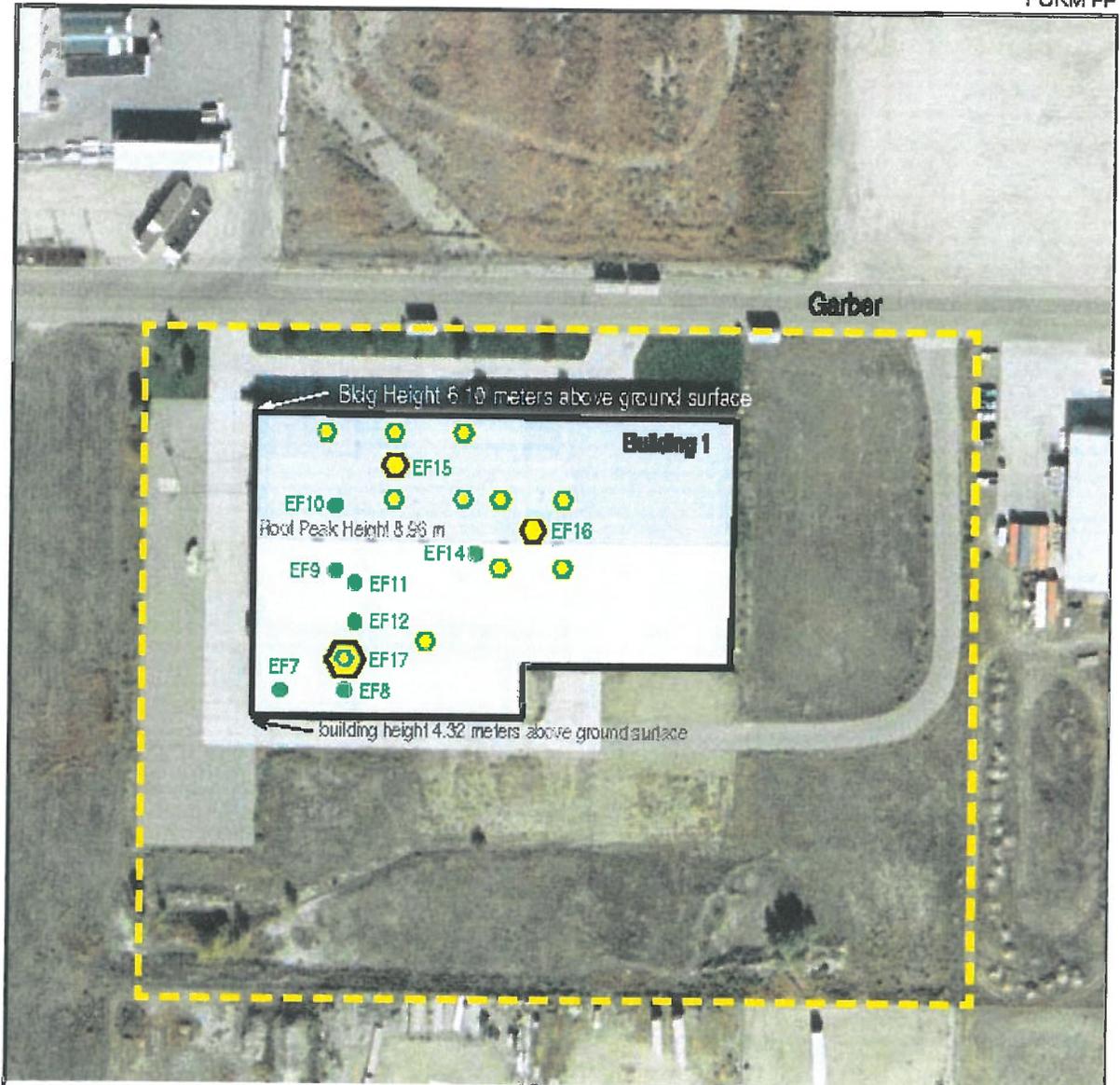
##### Process Description

BBS employs an “open-plan” production floor in the Lamination Area. The open-plan system improves efficiencies as the units are moved through the production cycle. Molds on wheeled carts are brought into the Lamination Area from Mold Storage. The first material, gel coat, is applied to the molds using atomizing, manual spray guns. The molds are then moved east to the next station where a second layer, barrier coat, is applied using atomizing, manual spray guns. The molds are then moved clockwise through two more stations where two layers of resin and chopped glass strand are applied using non-atomizing, manual spray guns. The surface is “rolled” to remove any trapped air. The resin is given time to cure, after which the units are removed from the molds before being moved into the next production area.

##### Additional Equipment

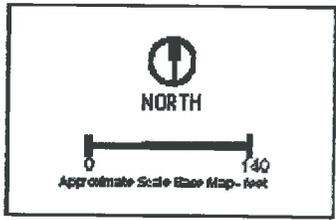
The open plan floor eliminates the traditional spray booths for the different sprayed layers. Instead, air exhaust and emission control are handled differently. Two long, cylindrical horizontal ducts are suspended above the production floor along the north and south Room 2 walls. Fourteen intakes (seven per duct) are spaced along the horizontal ducts. These intakes are 50” by 12” rectangular ducts that descend to the shop floor. Approximately 1 foot above the floor, each intake has a 24” by 24” opening fitted with particulate control filters. Emissions from the Lamination Area stations are drawn via two exhaust fans into and up the intakes, through the horizontal ducts, and discharged outside, vertically, above the roof from stacks EF9 and EF10.

Fresh air to the Lamination Area is provided by a direct-fired, natural gas Make Up Air Unit, MAU1. The Lamination Area is designed to operate under negative pressure. The atomizing spray gun used for the gel



-  Building Edge
-  Property Boundary
-  Emission Point
-  Actual Unit Heater Location
-  Modeled Unit Heater Location (composite)

Base Map Source: Valley Air Photos, Caldwell, Idaho, October 1, 2009



**Figure 6-1 Plot Plan**  
 723 Garber Street  
 Caldwell, Idaho 83605 March 2010

and barrier coat application is a Magnum Venus ATG-3500 gel gun. The non-atomizing spray gun used for the resin application is a Magnum Venus TRT-1000-F.

The fourteen exhaust 24" x 24" exhaust air filter units, EC9A to EC9G and EC10A to EC10G, are equipped with two Purolator fiberglass panel filters installed in series: FACET-Aire F312 with an average arrestance of 72 wt% and Purolator Bulk Media with an average arrestance of 84 wt%. Test data for the F312 filter and manufacturer's specification sheets for both filters was provided in the application. Test data to support the manufacturer's spec sheet were not available for the bulk media. The calculated overall arrestance of the two filters in series is:

$$\text{Overall Arrestance, \%} = 100\% - 100\% * (1 - 0.72) * (1 - 0.84) = 95.5 \text{ wt\%}$$

However, because of the lack of test data documentation for the bulk media, for this permit analysis 90% filter efficiency was used.

#### EU11 – Trim/Finish Area

The Trim/Finish Area includes finishing raw edges, installing plumbing holes, spraying reinforced flooring and touching-up small flaws on the tub and shower units.

At the Blue Bottom Area rigid floor foam is manually sprayed under the base of some units. At the Finish Area, inspection and any required touch-up work occur. Assembly/Packaging includes attaching fixtures and crating for shipment.

#### Equipment

Fresh air for the Trim/Finish Area is provided by a direct-fired, natural gas Make Up Air Unit, MAU2. Emissions from the Blue Bottom Area stations are drawn via two exhaust fans, EF11 and EF12, located on the roof directly above the Blue Bottom Area. Intake plenums equipped with particulate filters, EC11 and EC12, descend to the shop floor adjacent to the Blue Bottom spray area.

The Trim Room corridors (approximately 15 feet tall) are also equipped with particulate emission control equipment, ECT1 and ECT2. Trim Room fans, RF1 and RF2, draw air from the trimming area through particulate filters. The Trim Room fans discharge the filtered air back into the Trim/Finish Area, not to the outside.

All of the particulate filters used are equivalent or more efficient than Purolator FACET-Aire F312 and Purolator Bulk Media used in emission calculations. Currently, particulate filters at the Trim Room corridors are American Air Filter and Durashield Cartridge Filter. The manufacturer indicates a minimum efficiency value of greater than or equal to 90%.

Since the Trim Room fans discharge back into the Trim/Finish Area, particulate not captured by the Trim Room filters could be discharged outside via exhaust fans EF11 or EF12. To estimate the facility particulate emissions from the Trim Room operations, 80% capture and control efficiency was estimated for the Trim Rooms circulating air treatment system.

#### EU15/EU16/EU17 – Unit Heaters

There are eleven gas-fired unit heaters installed throughout the facility. These units typically have an input design duty of 300,000 Btu/hr. The combustion gases from these units are vented via 8" ducts directly up through the roof. Because the potential emissions from each of these small units is not large, and because they are clustered together in certain rooms around the facility, groups of heaters are collocated into three composite point sources for emission estimating. EU15 is a composite of five unit heaters located in the Mold Maintenance Area (Room 1). EU16 is a composite of four unit heaters located in the Assembly/Packaging Area (Room 4). EU17 is a composite of two unit heaters located in and just outside the Maintenance Room.

#### MAU – Make Up Air Unit 1

Fresh air to the Lamination Area is provided by a make up air unit, MAU1, located just outside the west wall of the building. For cold weather operations, MAU1 includes a direct-fired, natural gas fueled air

heater with a design input duty of 8.565 MMBtu/hr. A Hastings Model SBD 233 make up air unit has been specified for this service. The unit is direct-fired and the combustion gas are emitted via the Lamination Area exhaust fans, EF9 and EF10.

#### MAU2 – Make Up Air Unit 2

Fresh air to the Trim/Finish Area is provided by a make up air unit, MAU2, located just outside the west wall of the building. For cold weather operations, MAU2 includes a direct-fired, natural gas fueled air heater with a design input duty of 1.00 MMBtu/hr. A Hastings Model SBD 215 make up air unit has been specified for this service. The unit is direct-fired and the combustion gas will be emitted via the Blue Bottom Area exhaust fans, EF11 and EF12.

#### Spray Paint Booth

The Accent Booth is located in the Assembly/Packaging Area and is used to apply trim color to certain tub and shower units. Automotive paint is applied with a manual spray gun. Accent painting is not done on every tub and shower unit. Therefore the paint booth typically operates 2-3 days per week.

The booth is equipped with an exhaust fan, EF14, which draws booth air through overspray filters and discharges through a roof stack. BBS will install overspray air filters and pre-filters with a minimum combined capture efficiency of 90%. The Accent Booth exhaust fan is a Greenheck Model TAB-30-030T3, operating at 12,600 CFM.

Wet coatings are applied using a Sata Jet gravity-feed manual spray gun. The EPA reports typical transfer efficiency of 25% for wet coating spray application. All wet coating particulate emissions are conservatively assumed to be PM<sub>10</sub>. All volatile wet coating components are assumed to be completely emitted.

### 3.2 Facility Permitting History

#### 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).

June 22, 2010      P- 2010.0047, Initial permit to construct (PTC), Permit status (A)

## 4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

### 4.1 Application Scope

This permit is the initial Tier I operating permit for this facility.

### 4.2 Application Chronology

November 2, 2012	DEQ received an application.
December 28, 2012	DEQ determined that the application was complete.
January 9, 2013	DEQ made available the draft permit and statement of basis for peer and regional office review.
January 16, 2013	DEQ made available the draft permit and statement of basis for applicant review.
March 11 – April 10, 2013	DEQ provided a public comment period on the proposed action.
April 22, 2013	DEQ provided the proposed permit and statement of basis for EPA review.
May 22, 2013	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 – Production of Bath Units

Table 5.1 lists the emissions units and control devices associated with the production of bath units.

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

Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Coatings applications during fabrication of fiberglass reinforced plastics	For PM/PM <sub>10</sub> /PM <sub>2.5</sub> control: 1-inch fiberglass filter (approximately 72% efficiency); and fiberglass bulk media filter (approximately 84% efficiency)	EF-9, EF-10, EF-11, and EF-12
Accent application in a paint booth	For VOC and HAP control: Control of operations in accordance with NESHAP/MACT requirements	EF-14
Trim and finish operations. Rough edges are trimmed and plumbing holes are drilled. Exhaust from this area is filtered and exhausted back into the Trim Room work area. It is not directly vented to the outside.	For PM/PM <sub>10</sub> /PM <sub>2.5</sub> control: High-efficiency cartridge filters with a minimum efficiency of 90%.	---
Combustion emissions from a makeup air unit with an input rating of approximately 8.6 MMBtu/hr. Emissions from this direct-fired natural gas fueled unit are vented thru the fiberglass production area exhaust stacks.	Use of natural gas fuel, and good combustion control	EF-9, EF-10, EF-11, and EF-12

Best Bath Systems produces fiberglass shower and tub units primarily using spray layup techniques on open molds. Typically, three polyester-styrene layers are applied to molds to create the units: gel coat, barrier coat, and glass-reinforced resin. A fourth polymeric diisocyanate material, "blue foam," is sprayed on to create reinforced floors. The first three layers are applied in the Lamination Area. Accents may be applied in a paint booth (EF-14).

The air ventilation system for production operations exhausts through a series of two filters to stacks as listed below. The exhaust from the air ventilation system first passes through a fiberglass bulk media filter and then through a 1-inch fiberglass filter. Emissions from the makeup air units are co-mingled with the production area emissions, and exit the building through the production area stacks.

### 5.2 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 5.2 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

**Table 5.2 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION**

Emissions Unit / Activity	Regulatory Authority / Justification
11 natural gas-fired unit heaters less than 5,000,000 Btu/hr	58.01.01.317(b)(5)
Make up air unit #2 less than 5,000,000 Btu/hr fired on natural gas	58.01.01.317(b)(5)

**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 findings on which this shield is based are presented below:

- Requirements for Which a Permit Shield Will Be Granted

IDAPA 58.01.01.675-681 – Fuel Burning Equipment – Particulate Matter

This regulation is not an applicable requirement for the facility. The natural gas-fired makeup air and unit heaters at the facility are direct heat transfer units.

IDAPA 58.01.01.700-701 – Particulate Matter Process Weight Limitations

This regulation establishes process weight limitation for emissions. The particulate matter at the facility is contributed by gel coats, barrier coat, resin and paints used. Because the maximum 24-hour averaged particulate rate satisfies the regulation, the requirement is not applicable.

40 CFR 60 Subpart Kb – NSPS Standards for Volatile Organic Liquid Storage

This regulation is not applicable to the facility. The combined capacity of the resin storage tanks is less than the 19,800 gallon threshold for applicability.

40 CFR 63 Subpart HHHHHH – NESHAP for Paint Stripping and Misc. Surface Coating

This regulation is not applicable to the facility. The paint coatings applied at the facility do not contain the target HAPs of chromium, lead, manganese, nickel, or cadmium.

- Requirements for Which a Permit Shield Will Not Be Granted

40 CFR 98 – Mandatory Greenhouse Gas Reporting Rule

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.

**5.4 Emissions Inventory**

Table 5.3 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 5.3 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 A of this statement of basis.

**Table 5.3 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)**

Source Description	PM <sub>10</sub> T/yr	NO <sub>x</sub> T/yr	SO <sub>2</sub> T/yr	CO T/yr	VOC T/yr	Lead T/yr	HAP T/yr	GHG CO <sub>2</sub> e T/yr
Lamination Area South, MAU1 – EF9	2.05	0.00	0.00	0.00	0.00	0.00	100.1	
Lamination Area North, MAU1 – EF10	2.05	0.00	0.00	0.00	0.00	0.00		
Blue Bottom Area North, MAU2 – EF11	0.38	0.00	0.00	0.00	0.00	0.00		
Blue Bottom Area South, MAU2 – EF12	0.38	0.00	0.00	0.00	0.00	0.00		
Accent Booth – EF14	0.22	0.00	0.00	0.00	0.00	0.00	0.18	
All VOC Sources	0.00	0.00	0.00	0.00	108 <sup>a</sup>	0.00		
All Natural Gas Combustion Sources	0.42	5.52	0.033	4.64	0.30	0.00	0.11	6694
<b>Total Emissions</b>	<b>5.50</b>	<b>5.52</b>	<b>0.033</b>	<b>4.64</b>	<b>108.30</b>	<b>0.00</b>	<b>100.39</b>	<b>6694</b>

a) For detail of VOC emissions refer to Appendix A.

## 6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Production of Bath Units Emissions Limits;
- Tier I Operating Permit General Provisions.

### ***MRRR***

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting 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. This is known as gap filling. In addition to the specific MRRR described under each permit condition, generally applicable facility-wide conditions and general provisions may also be required, such as monitoring, recordkeeping, performance testing, reporting, and certification requirements.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, a description of why and how the condition was changed 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 3.10 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 Curtailement 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 - 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 3.16 - Asbestos**

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[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 3.17 - Accidental Release Prevention**

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)]

### **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 - 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 3.19 - NESHAP General Provisions**

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

[40 CFR 60, 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 3.20 - 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 3.21 through 3.24 - 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 3.24)**

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 3.25 - 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 3.26 - 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 MRR**

#### **Production of Bath Units (Stacks EF-9, EF-10, EF-11, EF-12, and EF-14)**

Permit Condition 17 in P-2010.0047 PROJ 0047 was not incorporated into the Tier I operating permit because this condition has been satisfied with the performance tests performed on 9/12/2012. Permit Condition 20 in P-2010.0047 PROJ 0047 was not incorporated into the Tier I operating permit because this condition was previously satisfied. In addition, Permit Condition 21 in P-2010.0047 PROJ 0047 was not incorporated into the Tier I operating permit because this condition was satisfied with the submittal of the Tier I application.

#### **Permit Condition 4.1, Emission Limits**

Total emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>) from Stacks EF-9, EF-10, EF-11, and EF-12 shall not exceed any corresponding emission limit listed in Table 4.3. Total emissions of volatile organic compounds (VOCs) from Stacks EF-9, EF-10, EF-11, and EF-12 shall not exceed any corresponding emission limit listed in Table 4.3. Three years from the date of notification of exceedance of the HAP emission threshold specified in 40 CFR 63.5805(c), the total VOC emission limit specified in Table 4.3 of this permit shall not apply, and the permittee shall comply with the emission limits specified in 40 CFR 63.5805(d).

**Table Error! Reference source not found..3. Lamination area and blue bottom area emission limits<sup>a</sup>.**

Pollutant	Lb/hr <sup>c</sup>	T/yr <sup>d</sup>
PM <sub>10</sub> <sup>b</sup>	1.60	
Total VOCs		108

- a) In absence of any other credible evidence, compliance is assured 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 58.01.01.006.81.
- c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.
- d) Tons per any consecutive 12-calendar month period.

**MRRR - (Permit Conditions 4.9, 4.15 through 4.17)**

This facility is required to comply with the emissions standards for PM<sub>10</sub> and VOCs. The PM<sub>10</sub> emission limit is demonstrated through compliance with the spray gun and filter specifications and the dust collection system. Compliance has already been demonstrated with a performance test. The VOC emission limit is demonstrated through the material usage records and the VOC emissions determination equation.

**Permit Conditions 4.2 – 4.4, MACT Limitations, Work Practice Standards, and Compliance Deadlines**

Permit Conditions 4.2 through 4.4 of the permit incorporate the requirements of 40 CFR 63 Subpart WWWW. Should there be a conflict between Subpart WWWW and the permit, Subpart WWWW shall govern including any amendments to the regulation.

**MRRR - (Permit Conditions 4.10 – 4.14 and 4.21 – 4.32)**

Monitoring, recordkeeping, testing, and reporting requirements necessary to demonstrate compliance with the MACT limitations, work practice standards, and compliance dates are specified by the MACT requirements in Permit Conditions 4.10 through 4.14 and 4.21 through 4.32.

**Permit Condition 4.5, Opacity Limit**

Emissions from Stacks EF-9, EF-10, EF-11, EF-12, and EF-14, or any other stack, vent, or functionally equivalent opening associated with the coating application process, 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.

**MRRR - (Permit Conditions 3.8 through 3.9 and 4.19)**

The facility is required to comply with the state opacity standard. The facility is required to report each instance where the requirements are not met.

**Permit Condition 4.6, Reasonable Control of Fugitive Dust Emissions**

In accordance with IDAPA 58.01.01.651, all reasonable precautions shall be taken to prevent PM from becoming airborne. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne

dusts.

- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

**MRRR - (Permit Conditions 3.2 through 3.4 and 4.20)**

The facility is required to comply with all fugitive dust requirements including reasonably controlling PM that may become airborne. The facility is required to report each instance where the requirements are not met.

**Permit Condition 4.7, Odorous Emissions**

Odorous gases shall not be emitted to the atmosphere in such quantities as to cause air pollution, as required by IDAPA 58.01.01.775.

**MRRR - (Permit Conditions 3.5 through 3.6 and 4.18)**

The facility is required to comply with all odor requirements and to minimize odorous gases that may be emitted. The facility is required to report each instance where the requirements are not met.

**Permit Condition 4.8, Use of Natural Gas in Fuel-burning Equipment**

The permittee shall burn natural gas exclusively in the fuel-burning equipment at this facility.

**MRRR**

No MRRR has been required in the permit for this permit 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.

**6.3 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 58.01.01.322.15.1, 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.

### **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 Canyon County which is designated as attainment or unclassifiable for PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>2</sub>, SO<sub>x</sub>, and Ozone. Reference 40 CFR 81.313.

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

The facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for VOC and 10 tons per year for any one HAP (i.e., styrene) as demonstrated previously in the Emissions Inventory Section of this analysis. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10, and is subject to Tier I permitting requirements.

### **7.3 PSD Classification (40 CFR 52.21)**

The facility is not a major facility for the purposes of the federal prevention of significant deterioration (PSD) program as referenced by IDAPA 58.01.01.205 because the facility does not emit or has the potential to emit a regulated criteria air pollutant in amounts greater than or equal to the major threshold criteria of 250 T/yr. Greenhouse gases (GHG) are not subject to regulation at this facility because the

facility does not emit or have the potential to emit GHG in amounts greater than or equal to the major threshold criteria of 100,000 T/yr CO<sub>2</sub>e.

**7.4 NSPS Applicability (40 CFR 60)**

The facility is not subject to any New Source Performance Standards (NSPS) in 40 CFR 60.

**7.5 NESHAP Applicability (40 CFR 61)**

The facility is not subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR 61.

**7.6 MACT Applicability (40 CFR 63)**

The facility is subject to the requirements of 40 CFR 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. Refer to PTC No. P-2010.0047 PROJ 0047, issued June 22, 2010 for the complete MACT applicability breakdown for the facility.

In referring to the MACT applicability breakdown for the facility, it is noted that MACT alternative emission limitations (40 CFR 63.5805) were not placed in the permit. The VOC emission limit listed in Table 4.3 of the permit guarantees that HAP emissions will not exceed 99 tons per year.

**7.7 CAM Applicability (40 CFR 64)**

Individual permit units at facilities that are subject to Title V permitting requirements (Tier I permits) may be subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). 40 CFR Part 64 requires CAM for units that meet the following three criteria:

- 1) In accordance with 40 CFR 64.2(a)(1), the unit must have an emission limit for the pollutant;
- 2) In accordance with 40 CFR 64.2(a)(2), the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) In accordance with 40 CFR 64.2(a)(3), the unit must have a pre-control potential to emit of greater than the major source thresholds.

The lamination area and blue bottom area are limited by emission limits for both VOCs and PM<sub>10</sub>. Within both the lamination and blue bottom areas there are units that have add-on controls such as fiberglass and cartridge filters. The facility as a whole has a pre-control potential to emit of VOCs greater than major source thresholds but there are no pollutant-specific emission units (PSEU) that have emissions greater than major source thresholds. Therefore, CAM (Subpart 64) does not apply to this facility.

**7.8 Acid Rain Permit (40 CFR 72-75)**

BBS is not an affected facility as defined in 40 CFR 72 through 75. Acid Rain permit requirements are therefore not applicable.

**8. PUBLIC COMMENT**

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from March 11, 2013 to April 10, 2013. During this time, one comment was submitted in response to DEQ's proposed action. A response to public comments document has been crafted by DEQ based on the comment 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 April 22, 2013 via e-mail. On May 17, 2013, EPA Region 10 responded to DEQ via e-mail indicating that EPA has reviewed the proposed permit action, will not object to its issuance, and that the permit is now eligible for issuance.

## Appendix A - Emissions Inventory



**Table 3-1: Air Quality Permit NESHAP Analysis**

Process Step	Process Feeds	Product code	2009 Feed Quantity (lbs)	Hazardous Air Pollutants (HAP) in Feed	HAP Content (MSDS wt%)	2009 HAP Quantity (lb)	HAP Conc. (avg. wt%)	Subpart WWWW Table 1 Emission Factor	Emission Factor (lb HAP/ton feed)	Overall Emission Factor (wt. lb HAP/in lb)	Subpart WWWW Table 3 Emission Limit	Emission Limit (lb HAP/ton feed)	Overall Emission Limit (wt. lb HAP/in lb)	2009 Total Emissions (ton HAP per yr)	Permit Multiplier: 99 ton HAP/yr
1 Gel Coat	Norox Norox Luperox	MEK-9H MCP-75 DDM-9	8735 4462 4608	dimethyl phthalate DMP, cumene, acetophenone	43.0% 37.0% 0.0%	3766 1651 0	30.4%		275						
	White gelcoat initiator (calc'd) <sup>a</sup> Bone gelcoat Almond gelcoat Linen gelcoat Bisquid gelcoat Saffers all colors GCP all colors Initiator (calc'd)	WG-TS-8045 WG-2X8113 WG-2X1120 WG-2X8125 WG-2X8117 Grenicoat ArmoFlex 577CB0045	131982 7688 6383 1180 5366 732 380 444	styrene, Co DMP, cumene, acetophenone styrene, Co styrene, Co styrene, Co styrene, Co styrene, MMA styrene, Co, MMA DMP, cumene, acetophenone styrene, MMA	30.9% 30.4% 36.9% 36.9% 37.0% 37.1% 28.0% 34.0% 30.4% 60.0% 30.4%	40786 811 2911 2349 437 1981 205 129 435 2850 35	30.9%	1. Open molding f. atomized spray gel coat application w/ nonvapour- suppressed gel coat	366	160	5. Open molding-gel coat b. white/off white gel coat	377	287		36
2 Barrier	Barrier coat Initiator (calc'd)	VPRC-012	163052	styrene, Co DMP, cumene, acetophenone	32.9% 30.4%	53944 1002	32.8%		382						
3 Resin and Fiber	Bulk resin Resin Resin Durglas Sylene Initiator (calc'd)	733-7854-xx 733-8650-xx 040-5635 2405E 54940	535706 3800 7800 1200 8020 11276	styrene, Co styrene, Co styrene styrene styrene DMP, cumene, acetophenone	38.5% 35.5% 32.2% 20.0% 100.0% 30.4%	180176 1349 2415 240 9020 3424	35.3%	1. Open molding c. nonatomized medt. resin application I. nonvapour- suppressed resin	81		2. Open molding- non- CRHS a. mechanical resin application	88			
			837705	lbs TQ4			35.0%	Overall HAP							

**Sample Calculations:**

a. Initiator (calc'd) = 2009 quantity of initiator used with associated coating = Total 2009 Initiator Use \* 2009 assoc. Gel/Barrier/Resin Use / 2009 Total Gel/Barrier/Resin Use

2009 Total Gel/Barrier/Resin Use = 131982+7688+6383+1180+5366+732+380+5700+163052+535706+3800+7500+1200+8020 lbs = 879869 lbs

White Gelcoat Initiator (calc'd) = (8736+4462+4608 lbs initiator in 2009) \* (131982 lbs 2009 White Gelcoat) / (879869 lbs 2009 Total Gel/Barrier/Resin Use) = 2671 lbs White Gelcoat initiator

b. HAP Conc. (avg. wt%) = Weight of HAP in combined 2009 coating / 2009 combined coating use

White gelcoat HAP Conc. = (40786 + 811) / (131982 + 2671) \* 100% = 30.9%

c. Individual Emission Factors from Table 1, Subpart WWWW of Part 63. Formula used dependent of whether %HAP is > or < 33%.

30.9 wt% HAP White gelcoat Emission Factor = 0.445 \* %HAP \* 2000 = 0.445 \* 30.9 \* 2000 = 275 (Table 1: f. open molding with atomized spray gel coat application)

d. Overall Emission Factor = SUM( Individual Coatings Emission Factor \* Weight of individual Coatings) / Total Weight of Coatings

Total Weight of Coatings = 131982+2671+7688+6383+1180+5366+732+380+5700+163052+535706+3800+7500+1200+8020+11276 = 897705 lbs

Overall Emission Factor = (275\*(131982+2671) + 385\*(7688+6383+1180+5366+732+380+444) + 638\*(5700+115) + 292\*(163052+3300) + 81\*(535706+3800+7500+1200+8020+11276)) / 897705 = 160

e. Individual Emission Limits from Table 3, Subpart WWWW of Part 63.

White gelcoat Emission Limit = 2671 lb/ton (Table 3.6.b: Open Molding with white/off white pigmented gel coating)

f. Overall Emission Limit = SUM( Individual Coatings Emission Limits \* Weight of Individual Coatings) / Total Weight of Coatings

**Table 3-2: Chemical Use Calculation**

Feed Type	Compounds	Product code(s)	2009 Quantity (lbs)	99 ton/yr Permit Multiplier <sup>1</sup>	Permit Analysis Quantity (lbs)
Adhesive	Plexus	MA 300	321	2.76	885
	Plexus	MA 320	221		609
Finishing	Trempro	644 Sealant	543		1497
	TRI Buffing Compound	TR-311	150		413
Foam Fill	Hydroseal Floor	1027-7-50S "A"	21972		60562
		1027-7-50S "B"	20382		56180
	Instapack Packing	Component "A"	14778		40733
		Component "B"	19928		54928
Gel & Barrier Coats	Ashland White	WG-TS-8045	131992		363814
	Ashland Colors	WG-2X8113	7888		21742
		WG-2X8120	6383		17594
		WG-2X8125	1180		3252
		WG-2X8117	5366		14790
	Valspar Clear	577C90045	5700		15711
	Safas all colors	Granicoat	732		2018
	GCP all colors	Armorflex	380		1047
	Barrier coat	VPRO-012	163052		449426
Initiators	Norox	MEKP- 9H	8736		24079
		MCP-75	4462		12299
	Luperox	DDM-9	4608		12701
Paints	BASF Bases and Colors	UNO HD/SC	253		697
	BASF Reducer	UR50	60		165
	BASF Hardener	DH46ZZ	35		96
Resins	Resins	Hexion	535706		1476584
		Eastman	3800	10474	
		Cook	7500	20672	
		Duraglass	1200	3308	
	Styrene Monomer	Ashland 54940	9020	24862	
Solvents	Acetone		76719	211463	
	Denatured alcohol		200	551	
Waxes & Parting Agents	Frekote	FRP-NC	1050	2894	
	Frekote	FMS	790	2178	
	TRI	TR-104	86	237	
	TRI	TR-210	50	138	
	TRI	TR-111	72	198	
	Partall	Paste #2	375	1034	
	Partall	Film #10	36	99	

Notes: 1. See Table 3-1

**Table 3-4: Facility-Wide Combustion Emissions**

**FACILITY-WIDE DUTY:**

Operating Assumptions: 12.865 MMBtu/hr / 1,020 MMBtu/MMscf = 24 hr/day 8,760 hr/yr

EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (798)

Fuel Use: 0.303 MMscf/day 110.488 MMscf/year

Criteria Air Pollutants	Emission Factor	Emissions	
		lb/MMscf	T/yr
NO2	100	1.26E+00	5.52E+00
CO	84	1.06E+00	4.64E+00
PM10	7.6	9.69E-02	4.20E-01
SOx	0.6	7.57E-03	3.31E-02
VOC	5.5	6.94E-02	3.04E-01
Lead	0.0005	6.31E-08	2.76E-05
Lead, continued			5.37E-03 lb/quarter
<b>TOTAL</b>			<b>1.09E+01 T/yr</b>

Modeling Threshold	Modeling Required ?	Modeling Threshold	Modeling Required ?
2002 Guidance		Case-by-Case	
1 T/yr	YES	7 T/yr	No
14 lb/hr	No	70 lb/hr	No
0.2 lb/hr	No	0.9 lb/hr	No
1 T/yr	No	7 T/yr	No
0.2 lb/hr	No	0.9 lb/hr	No
1 T/yr	No	7 T/yr	No
40 T/yr	No		
0.6 T/yr	No		
10 lb/mo	No		

Note: 100 lb/mo Pb In guidance reduced by factor of 10 based on latest Pb NAAQS (reduced in 2008 from 1.5 ug/m3 to 0.15 ug/m3)

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)				Exceeds EL/Modeling Required?
	lb/MMscf	lb/hr	EL (lb/hr)	
<b>PAH HAPs</b>				
2-Methylnaphthalene	2.40E-05	3.03E-07	9.10E-05	No
3-Methylchloranthrene	1.80E-06	2.27E-08	2.50E-06	No
Acenaphthene	1.80E-06	2.27E-08	9.10E-05	No
Acenaphthylene	1.80E-06	2.27E-08	9.10E-05	No
Anthracene	2.40E-06	3.03E-08	9.10E-05	No
Benzo(a)anthracene	1.80E-06	2.27E-08	9.10E-05	See POM
Benzo(a)pyrene	1.20E-06	1.51E-08	2.00E-06	See POM
Benzo(b)fluoranthene	1.80E-06	2.27E-08		See POM
Benzo(g,h,i)perylene	1.20E-06	1.51E-08	9.10E-05	No
Benzo(k)fluoranthene	1.80E-06	2.27E-08		See POM
Chrysene	1.80E-06	2.27E-08		See POM
Dibenz(a,h)anthracene	1.20E-06	1.51E-08		See POM
Dichlorobenzene	1.20E-03	1.51E-05	9.10E-05	No
Fluoranthene	3.00E-06	3.78E-08	9.10E-05	No
Fluorene	2.80E-06	3.53E-08	9.10E-05	No
Indeno(1,2,3-cd)pyrene	1.80E-06	2.27E-08		See POM
Naphthalene	6.10E-04	7.69E-06	3.33	No
Naphthalene	6.10E-04	7.69E-06	9.10E-05	No
Phenanthrene	1.70E-06	2.14E-07	9.10E-05	No
Pyrene	5.00E-06	6.31E-08	9.10E-05	No
Polycyclic Organic Matter (POM)	7-PAH G	1.44E-07	2.00E-06	No
<b>Non-PAH HAPs</b>				
Benzene	2.10E-03	2.65E-05	8.00E-04	No
Formaldehyde	7.50E-02	9.40E-04	5.10E-04	YES
Hexane	1.80E+00	2.27E-02	12	No
Toluene	3.40E-03	4.29E-05	26	No
<b>Non-HAP Organic Compounds</b>				
7,12-Dimethylbenz(a)anthracene	1.60E-05	2.02E-07		
Butane	2.10E+00	2.65E-02		
Ethane	3.10E+00	3.91E-02		
Pentane	2.60E+00	3.28E-02	118	No
Propane	1.60E+00	2.02E-02		
<b>Metals (HAPs)</b>				
Asenic	2.00E-04	2.52E-06	1.50E-06	YES
Barium	4.40E-03	5.55E-05	0.033	No
Beryllium	1.20E-05	1.51E-07	2.80E-05	No
Cadmium	1.10E-03	1.39E-05	3.70E-06	YES
Chromium	1.40E-03	1.77E-05	0.033	No
Cobalt	8.40E-05	1.06E-06	0.0033	No
Copper	8.50E-04	1.07E-05	0.013	No
Manganese	3.80E-04	4.79E-06	0.067	No
Mercury	2.60E-04	3.28E-06	0.003	No
Molybdenum	1.10E-03	1.39E-05	0.333	No
Nickel	2.10E-03	2.65E-05	2.70E-05	No
Selenium	2.40E-05	3.03E-07	0.013	No
Vanadium	2.30E-03	2.90E-05	0.003	No
Zinc	2.90E-02	3.66E-04	0.667	No

Case-by-Case Modeling Thresholds may be used ONLY with prior DEQ Approval: Approved by DEQ (C.Robinson, 3/12/2010)

- requires air dispersion modeling

Total Combustion HAPs = 0.106 ton/yr

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

**Table 3-5a: North Unit Heaters (EU15) Emissions**

**EU15 Duty**

EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)

Operating Assumptions: 1.5 MMBtu/hr / 1,020 MMBtu/MMscf = 1.47E-03 MMscf/hr

24 hr/day

Fuel Use:  
0.035 MMscf/day  
12.882 MMscf/year

8,760 hr/yr

Criteria Air Pollutants	Emission Factor lb/MMscf	Emissions		Emission Source
		lb/hr	T/yr	
NO2	100	1.47E-01	6.44E-01	EF15
CO	84	1.24E-01	5.41E-01	
PM10	7.8	1.12E-02	4.90E-02	
		1.12E-02	4.90E-02	
SOx	0.6	8.82E-04	3.86E-03	
		8.82E-04	3.86E-03	
VOC	5.5	8.09E-03	3.54E-02	
Lead	0.0005	7.35E-07	3.22E-06	
Lead, continued			5.37E-03	
		TOTAL	1.27E+00	

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)				Emission Source
	lb/MMscf	lb/hr	EL (lb/hr)	
Formaldehyde	7.50E-02	<del>1.10E-04</del>	5.10E-04	EF15
Arsenic	2.00E-04	<del>2.94E-07</del>	1.50E-06	
Cadmium	1.10E-03	<del>1.62E-06</del>	3.70E-06	
Cobalt	8.40E-05	1.24E-07	0.0033	

requires air dispersion modeling

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

Best Bath  
Caldwell, ID

**Table 3-5b: East Unit Heaters (EU16) Emissions**

**EU16 Duty**

1.2 MMBtu/hr /

1,020 MMBtu/MMscf =

EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)

1.18E-03 MMscf/hr

Fuel Use:

0.028 MMscf/day

10.306 MMscf/year

Operating Assumptions:

24 hr/day

8,760 hr/yr

Criteria Air Pollutants	Emission Factor lb/MMscf	Emissions		Emission Source	
		lb/hr	T/yr		
NO2	100	1.18E-01	5.16E-01	EF16	
CO	84	9.88E-02	4.33E-01		
PM10	7.6	8.94E-03	3.92E-02		
		8.94E-03	3.92E-02		
SOx	0.6	7.08E-04	3.09E-03		
		7.08E-04	3.09E-03		
VOC	5.5	6.47E-03	2.83E-02		
Lead	0.0005	5.88E-07	2.58E-06		
Lead, continued			5.37E-03		lb/quarter
TOTAL			1.02E+00		T/yr

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)				Emission Source
	lb/MMscf	lb/hr	EL (lb/hr)	
Formaldehyde	7.50E-02	<del>8.82E-06</del>	5.10E-04	EF16
Arsenic	2.00E-04	<del>3.00E+00</del>	1.50E-06	
Cadmium	1.10E-03	<del>1.29E-06</del>	3.70E-06	
Cobalt	8.40E-05	<del>9.88E-06</del>	0.0033	

- requires air dispersion modeling

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

**Table 3-5c: South Unit Heaters (EU17) Emissions**

**EU17 Duty**  
 0.6 MMBtu/hr / 1,020 MMBtu/MMscf = 5.88E-04 MMscf/hr  
 Operating Assumptions: **24 hr/day** EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)  
**8,760 hr/yr** Fuel Use: **0.014 MMscf/day**  
**5.153 MMscf/year**

Criteria Air Pollutants	Emission Factor lb/MMscf	Emissions		Emission Source	
		lb/hr	T/yr		
NO2	100	5.88E-02	2.58E-01	EF16	
CO	84	4.94E-02	2.16E-01		
PM10	7.8	4.47E-03	1.96E-02		
		4.47E-03	1.96E-02		
SOx	0.6	3.53E-04	1.55E-03		
		3.63E-04	1.56E-03		
VOC	5.5	3.24E-03	1.42E-02		
Lead	0.0005	2.94E-07	1.29E-06		
Lead, continued			5.37E-03		lb/quarter
TOTAL			5.09E-01		T/yr

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)			Emission Source	
	lb/MMscf	lb/hr		EL (lb/hr)
Formaldehyde	7.50E-02	<del>4.41E-06</del>	5.10E-04	EF17
Arsenic	2.00E-04	<del>1.18E-07</del>	1.50E-08	
Cadmium	1.10E-03	<del>6.47E-07</del>	3.70E-06	
Cobalt	8.40E-05	<del>4.94E-08</del>	0.0033	

- requires air dispersion modeling

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

**Table 3-6: Make-up Air Unit #1 (MAU1) Emissions**

**MAU1 Duty**

8.565 MMBtu/hr /

1,020 MMBtu/MMscf =

EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)

8.40E-03 MMscf/hr

Fuel Use:

Operating Assumptions:

24 hr/day

0.202 MMscf/day

8,760 hr/yr

73.558 MMscf/year

Criteria Air Pollutants	Emission Factor lb/MMscf	Emissions		Emission Source
		lb/hr	T/yr	
NO2	100	8.40E-01	3.68E+00	
CO	84	7.05E-01	3.09E+00	
PM10	7.6	6.38E-02	2.80E-01	EF9 & 10
		6.38E-02	2.80E-01	
SOx	0.6	5.04E-03	2.21E-02	
		5.04E-03	2.21E-02	
VOC	5.5	4.62E-02	2.02E-01	
Lead	0.0005	4.20E-08	1.84E-05	
Lead, continued			5.37E-03	lb/quarter
TOTAL			7.27E+00	T/yr

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)			Emission Source
	lb/MMscf	lb/hr	
Formaldehyde	7.50E-02	<del>6.30E-04</del>	5.10E-04
Arsenic	2.00E-04	<del>1.68E-06</del>	1.50E-06
Cadmium	1.10E-03	<del>9.24E-06</del>	3.70E-06
Cobalt	8.40E-05	<del>7.05E-07</del>	0.0033

requires air dispersion modeling

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

**Table 3-7: Make-up Air Unit #2 (MAU1) Emissions**

**MAU2 Duty** 1 MMBtu/hr / 1,020 MMBtu/MMscf = EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/96)  
 Operating Assumptions: **24 hr/day** 9.80E-04 MMscf/hr Fuel Use:  
**8,760 hr/yr** **0.024 MMscf/day**  
 **8.588 MMscf/year**

Criteria Air Pollutants	Emission Factor lb/MMscf	Emissions		Emission Source
		lb/hr	T/yr	
NO2	100	9.80E-02	4.29E-01	
CO	84	8.24E-02	3.61E-01	
PM10	7.6	<b>7.45E-03</b>	3.26E-02	EF11 & 12
		7.45E-03	3.26E-02	
SOx	0.6	5.88E-04	2.58E-03	
		5.88E-04	2.58E-03	
VOC	5.5	5.39E-03	2.36E-02	
Lead	0.0005	4.90E-07	2.15E-06	
Lead, continued			5.37E-03	lb/quarter
TOTAL			8.49E-01	T/yr

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)			Emission Source	
	lb/MMscf	lb/hr		EL (lb/hr)
Formaldehyde	7.50E-02	<b>7.30E-06</b>	5.10E-04	EF11 & 12
Arsenic	2.00E-04	<b>1.96E-07</b>	1.50E-06	
Cadmium	1.10E-03	<b>1.08E-06</b>	3.70E-06	
Cobalt	8.40E-05	<b>8.24E-08</b>	0.0033	

- requires air dispersion modeling

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

Table 4-1: Accent Booth (EU14) Emissions Analysis

Coating ID Name Manufacturer	Permit Analysis Usage			HAP/TAP Component	CAS Number	Comp. Conc. (MSDS, wt%)	Coating Retention (%) <sup>2</sup>	Component Uncontrolled Emissions	
	lb/yr	days/yr	lb/day					lb/day	lb/yr
DH46 Hardener BASF	96	100	1.0	Hexamethylene Diisocyanate	822-06-0	1.0%	0.0%	0.010	0.96
				Methyl Amyl Ketone	110-43-0	35%	0.0%	0.338	33.8
UNO-HD SC403 Black BASF	697	100	7.0	Aluminum (metal and OH)	7429-90-5	10.0%	25.0%	0.52	52.3
				Aromatic Hydrocarbon	64742-85-6	25.0%	0.0%	1.74	174.3
				n-Butyl Acetate	123-86-4	30.0%	0.0%	2.09	209.2
				Carbon Black	1333-86-4	5.0%	25.0%	0.26	26.2
				Ethyl Benzene	100-41-4	3.0%	0.0%	0.21	20.9
				1-Methoxy 2-Propyl Acetate	108-65-6	10.0%	0.0%	0.70	69.7
				MIBK	108-10-1	10.0%	0.0%	0.70	69.7
				Stoddard Solvent	8052-41-3	3.0%	0.0%	0.21	20.9
				Trimethyl Benzene	25551-13-7	10.0%	0.0%	0.70	69.7
				Xylenes	1330-20-7	10.0%	0.0%	0.70	69.7
UR50 Mid Temp Reducer BASF	165	100	1.7	Aromatic Hydrocarbon	64742-##	15.0%	0.0%	0.25	24.8
				n-Butyl Acetate	123-86-4	65.0%	0.0%	1.07	107.5
				1-Methoxy 2-Propyl Acetate	108-65-6	20.0%	0.0%	0.33	33.1
				Stoddard Solvent	8052-41-3	15.0%	0.0%	0.25	24.8
				Trimethyl Benzene	25551-13-7	3.0%	0.0%	0.05	5.0

Toxic Air Pollutants - Accent Booth Summary	TAP Type (24 hr or Annual Averaging)	Screening Emission Level (lb/hr)	Booth Uncontrolled Emissions (lb/hr) <sup>1,3</sup>	Booth Uncontrolled Emissions (% of EL)
Aluminum	585 (24 hr)	0.667	0.022	3.3%
n-Butyl Acetate	585 (24 hr)	47.3	0.13	0.3%
Carbon Black	585 (24 hr)	0.23	0.011	5%
Ethyl Benzene	585 (24 hr)	29	0.01	0.0%
Hexamethylene diisocyanate	585 (24 hr)	0.002	0.0004	20%
1-Methoxy 2-Propyl Acetate	585 (24 hr)	24	0.04	0.2%
Methyl Amyl Ketone	585 (24 hr)	16	0.0	0.1%
MIBK	585 (24 hr)	13.7	0.03	0.2%
Stoddard Solvent	585 (24 hr)	35	0.02	0.1%
Toluene (Aromatic HCs)	585 (24 hr)	25	0.08	0.3%
Trimethyl Benzene	585 (24 hr)	8.2	0.03	0.4%
Xylene	585 (24 hr)	29	0.03	0%

**Appendix B - Facility Comments for Draft Permit**

**The following comments were received from the facility on March 1, 2013:**

**Facility Comment:** Remove the insignificant sources from the list of regulated sources.

**DEQ Response:** Table 5.1 has been revised in the Statement of Basis to remove the building unit heaters and Make-up Air Unit 2 because these are insignificant sources. Table 4.1 in the permit has been revised in the same manner.

**Facility Comment:** Remove the detailed list of General Conditions and Subpart WWWW table of emission equations and emission limits in favor of brief descriptions and references to the applicable federal rule. Many of the regulatory references deleted are listed in subsequent sections of the draft permit. For example, the requirements listed in the original Section 4.11 MACT Compliance Demonstration Requirements are repeated in the sections MACT Notifications, MACT Compliance Reporting, MACT Compliance Report, MACT Deviation Reporting, MACT Semiannual Monitoring Report, Other MACT Reports, etc.

**DEQ Response:** The facility has requested that the Tier I Operating Permit incorporate the same high level citation of 40 CFR 63 Subpart WWWW as found in the underlying PTC, P-2010.0047. DEQ has revised the permit to include the high level citation and has moved the breakdown of 40 CFR 63 Subpart WWWW to section 7.6 of the Statement of Basis.

**Facility Comment:** Delete tables or correct various table emission limit and work practice references (Subpart WWWW Table 3 and Table 5 missing "open molding – non CR/HS", Table 4 missing 5 of 8 operation specific work practice standards, Table 8 missing 5 operation-specific work practice standards, and Table 9 "closed molding with injection" and 5 other operation-specific compliance standards).

**DEQ Response:** These tables were included and summarized based on the information provided in the PTC application. These tables have been revised and/or deleted and inserted in section 7.6 of the Statement of Basis.

**Facility Comment:** Delete proposed permit condition 4.4. The MACT Alternative Emission Limitations (63.5805) do not apply to Best Bath. The permit analysis was based on never exceeding 99 tons/yr HAP to avoid this alternative limit. Best Bath cannot exceed 100 tons/yr HAP without exceeding the VOC limit in the permit.

**DEQ Response:** Permit Condition 4.4 has been removed.