Statement of Basis
Automotive Coating Operations General Permit

Final

University Collision
Moscow, Idaho
Facility ID No. 057-00045
Permit to Construct P-2011.0028
Project No. 61504

April 28, 2015
Randy Stegen RS
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.
ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE ........................................... 3

FACILITY INFORMATION .................................................................................. 4
  Description .................................................................................................. 4
  Permitting History ...................................................................................... 4
  Application Scope ...................................................................................... 4
  Application Chronology ............................................................................ 4

TECHNICAL ANALYSIS .................................................................................. 4
  Emissions Units and Control Devices ......................................................... 5
  Emissions Inventories ............................................................................. 5
  Ambient Air Quality Impact Analyses ..................................................... 5

REGULATORY ANALYSIS .............................................................................. 5
  Attainment Designation (40 CFR 81.313) ............................................. 5
  Permit to Construct (IDAPA 58.01.01.201) ........................................... 5
  Visible Emissions (IDAPA 58.01.01.625) ............................................. 5
  Rules for the Control of Odors (IDAPA 58.01.01.775-776) .................. 5
  Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70) .............. 6
  PSD Classification (40 CFR 52.21) ......................................................... 6
  NSPS Applicability (40 CFR 60) ............................................................. 6
  NESHAP Applicability (40 CFR 61) ......................................................... 6
  MACT Applicability (40 CFR 63) ............................................................ 6
  Permit Conditions Review ...................................................................... 8

PUBLIC REVIEW .......................................................................................... 8
  Public Comment Opportunity .................................................................. 8
ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>AQCR</td>
<td>Air Quality Control Region</td>
</tr>
<tr>
<td>Btu</td>
<td>British thermal units</td>
</tr>
<tr>
<td>CAS No.</td>
<td>Chemical Abstracts Service registry number</td>
</tr>
<tr>
<td>CE</td>
<td>Control Efficiency</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
</tr>
<tr>
<td>CO</td>
<td>carbon monoxide</td>
</tr>
<tr>
<td>DEQ</td>
<td>Department of Environmental Quality</td>
</tr>
<tr>
<td>EL</td>
<td>screening emission levels</td>
</tr>
<tr>
<td>EPA</td>
<td>U.S. Environmental Protection Agency</td>
</tr>
<tr>
<td>gal/day</td>
<td>gallons per calendar day</td>
</tr>
<tr>
<td>gal/hr</td>
<td>gallons per hour</td>
</tr>
<tr>
<td>gal/yr</td>
<td>gallons per consecutive 12 calendar month period</td>
</tr>
<tr>
<td>gr</td>
<td>grain (1 lb = 7,000 grains)</td>
</tr>
<tr>
<td>HAP</td>
<td>hazardous air pollutants</td>
</tr>
<tr>
<td>hr/yr</td>
<td>hours per year</td>
</tr>
<tr>
<td>HVLP</td>
<td>high volume, low pressure (applies to paint guns)</td>
</tr>
<tr>
<td>IDAPA</td>
<td>a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act</td>
</tr>
<tr>
<td>lb/gal</td>
<td>pounds per gallon</td>
</tr>
<tr>
<td>lb/hr</td>
<td>pounds per hour</td>
</tr>
<tr>
<td>LPG</td>
<td>Liquefied Petroleum Gas</td>
</tr>
<tr>
<td>MMBtu</td>
<td>million British thermal units</td>
</tr>
<tr>
<td>MSDS</td>
<td>Material Safety Data Sheet</td>
</tr>
<tr>
<td>NAICS</td>
<td>North American Industry Classification System</td>
</tr>
<tr>
<td>NESHAP</td>
<td>National Emission Standards for Hazardous Air Pollutants</td>
</tr>
<tr>
<td>NO₂</td>
<td>nitrogen dioxide</td>
</tr>
<tr>
<td>NOₓ</td>
<td>nitrogen oxides</td>
</tr>
<tr>
<td>NSPS</td>
<td>New Source Performance Standards</td>
</tr>
<tr>
<td>PC</td>
<td>permit condition</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers</td>
</tr>
<tr>
<td>ppm</td>
<td>parts per million</td>
</tr>
<tr>
<td>PTC</td>
<td>permit to construct</td>
</tr>
<tr>
<td>PTE</td>
<td>potential to emit</td>
</tr>
<tr>
<td>Rules</td>
<td>Rules for the Control of Air Pollution in Idaho</td>
</tr>
<tr>
<td>scf</td>
<td>standard cubic feet</td>
</tr>
<tr>
<td>SIC</td>
<td>Standard Industrial Classification</td>
</tr>
<tr>
<td>SM₈₀</td>
<td>synthetic minor facility with emissions greater than or equal to 80% of a major source threshold</td>
</tr>
<tr>
<td>SO₂</td>
<td>sulfur dioxide</td>
</tr>
<tr>
<td>SOₓ</td>
<td>sulfur oxides</td>
</tr>
<tr>
<td>T/yr</td>
<td>tons per consecutive 12-calendar month period</td>
</tr>
<tr>
<td>T2</td>
<td>Tier II operating permit</td>
</tr>
<tr>
<td>TAP</td>
<td>toxic air pollutants</td>
</tr>
<tr>
<td>TE</td>
<td>Transfer Efficiency</td>
</tr>
<tr>
<td>UTM</td>
<td>Universal Transverse Mercator</td>
</tr>
<tr>
<td>VOC</td>
<td>volatile organic compounds</td>
</tr>
</tbody>
</table>
FACILITY INFORMATION

Description
University Collision is an auto body repair and refinishing facility with paint spray booths which is/are equipped with a paint booth heater. The paint booth is a down draft booths with glass fiber filtration media for control of particulate emissions. Drying and paint curing is done in the paint booth. The booths are equipped with a natural gas-fired burner to heat the paint booth. The process includes application of coatings via a HVLP (or equivalent) paint gun.

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).
February 2, 2011 P-2011.0028, Initial permit to construct, Permit status (A, but will become S upon issuance of this permit)

Application Scope
This PTC is a revision of an existing PTC for a facility name change.

Application Chronology
April 10, 2015 DEQ received the application for the name change.
April 28, 2015 DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS
The facility utilizes glass fiber filtration media for control of particulate matter emissions from the automotive coating operation. In addition, HVLP paint guns (or equivalent) are used to minimize PM$_{10}$ and VOC emissions from painting. The HVLP (or equivalent) spray equipment will control PM$_{10}$ and VOC emissions by having more paint transfer to the desired surfaces than traditional painting equipment.
Emissions Units and Control Devices

Table 1 EMISSIONS UNIT AND CONTROL DEVICE INFORMATION

<table>
<thead>
<tr>
<th>ID No.</th>
<th>Source Description</th>
<th>Control Equipment Description</th>
<th>Emissions Point ID No. and Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>Paint spray booths and/or preparation station</strong>: Manufacturer: Custom built, or equivalent Model: 16 X 24 X 8</td>
<td><strong>Paint spray booths and/or preparation station filter system</strong>: Booth Types: Down draft Particulate filtration method: Dry Filters Manufacturers: Viledon, or equivalent Models: 400 PM/PM10 Control Efficiency: 98% or greater</td>
<td>Paint booth exhaust stack and/or preparation station exhaust stack</td>
</tr>
<tr>
<td></td>
<td><strong>Paint booth heaters</strong>: Manufacturer: Bonanza or equivalent Model: none specified Total Heat input capacity: 0.432 MMBtu/hr (worst-case was assumed to be 10.0 MMBtu/hr) Fuel: natural gas only</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Coating spray guns</strong>: Manufacturers: SATA or equivalent Models: NR 95, NR 2000, or equivalent Type: HVLP, or equivalent Transfer Efficiency: 65% or greater</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Emissions Inventories

This permitting action is for a facility name change. Emissions inventories are not required.

Ambient Air Quality Impact Analyses

This permitting action is for a facility name change. Ambient air quality impact analyses are not required.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

This facility is located in Latah County, which is designated as attainment or unclassifiable for PM2.5, PM10, SO2, NO2, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

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 a facility name change. 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.

IDAPA 58.01.01.220 General Exemption Criteria for Permit to Construct: Exemptions

Visible Emissions (IDAPA 58.01.01.625)

IDAPA 58.01.01.625 Visible Emissions

The emissions from the automotive coating process are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 6.

Rules for the Control of Odors (IDAPA 58.01.01.775-776)

IDAPA 58.01.01.775-776 Rules for the Control of Odors

The facility is subject to the general restrictions for the control of odors from the facility. This requirement is assured by Permit Conditions 7 and 12.
**Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)**

IDAPA 58.01.01.301 Requirement to Obtain Tier I Operating Permit

The facility is a minor source and is not a Tier I source in accordance with IDAPA 58.01.01.006; the requirements of IDAPA 58.01.01.301 do not apply.

**PSD Classification (40 CFR 52.21)**

40 CFR 52.21 Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source, not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore, in accordance with 40 CFR 52.21(a)(2), the PSD requirements do not apply.

**NSPS Applicability (40 CFR 60)**

The facility is not subject to any NSPS requirements.

**NESHAP Applicability (40 CFR 61)**

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

**MACT Applicability (40 CFR 63)**

Because this facility applies spray-applied coatings to motor vehicles the requirements of NESHAP subpart HHHHHH may apply. However, DEQ has not been delegated implementation of this subpart by EPA. Therefore, facilities that may be exempt from the requirements of this subpart must send the exemption request to EPA. Therefore, for this evaluation the requirements of this subpart will be determined for the facility but all HHHHHH requirements in the permit will be prefaced with “Unless an exemption from the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2), …”

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

§ 63.11169 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 an existing source because it commenced construction prior to 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 actively engaged in paint stripping and/or miscellaneous surface coating prior to September 17, 2007.

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

In accordance with §63.11172(a)(2), because the initial startup of the facility occurred prior to January 9, 2008, the compliance date is January 10, 2011.

§ 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 17.

§ 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 16.

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 existing operation, the Initial Notification must be submitted no later than on or before March 11, 2011.

In accordance with §63.11175(b), because the facility is an existing 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 18.

§ 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 19.

Because the facility has not proposed to conduct paint stripping operations, the MeCl minimization plan requirements are not applicable (see permit condition 9).

§ 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 17.

§ 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 17.

§ 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 58.01.01.107.05.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 that have been added, revised, modified or deleted as a result of this permitting action.

Permit condition 2.1 was changed to show the facility name as University Collision.

**PUBLIC REVIEW**

**Public Comment Opportunity**

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.