



Air Quality Permitting Response to Public Comments

February 8, 2018

Permit to Construct No. P-2010.0144

Project No. 61958

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

Facility ID No. 083-00100

Prepared by:
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AIR QUALITY DIVISION

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct for Lippert Components Inc from January 3, 2018 through February 2, 2018, in accordance with IDAPA 58.01.01.209.01.c. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the proposed permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: <http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

- Comment 1:** Tables 2.3 and 2.7 in the draft permit lists the various coating materials and their associated daily and annual usage limits. Coating materials Patriot 3-1549, Patriot 6-KMA-0210, Sherwin Williams F75BC500, and Cloverdale Paint 792512 all share a daily usage limit of 46.6 gal/day and an annual usage limit of 17,000 gal/yr. It's unclear from the tables if the prescribed limits apply to each coating material individually or if the values limit the cumulative use of all coating materials combined. We recommend including footnotes to Table 2.3 and Table 2.7 clarifying this issue.
- Response 1:** This is a good recommendation. Footnotes have been added to the tables denoting each total as an "Aggregate total". The Statement of Basis also specifies that this is an aggregate total. DEQ thanks the commenter for the suggestion.
- Comment 2:** To estimate the coating TAP emissions, Permit Condition 2.17 includes the following instructions, "When the TAP content is below detection and cannot be determined from SDS or other documentation, the TAP content shall be assumed to be the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions." However, later on in the draft permit, the fifth bullet point under Permit Condition 2.19 states: "When the solids content, VOC content, or TAP content cannot be determined from SDS or other documentation, the density of the coating (lb/gal) shall be used when estimating emissions." It seems that there may be a discrepancy here with regards to scenarios where TAP content is undeterminable from the SDS. Permit Condition 2.17 instructs the permittee to use a TAP content of 1% of the coating density, whereas 2.19 requires the permittee to use 100% of the coating density when TAP content is unknown. Perhaps the difference is related to the difference between estimating emissions and demonstrating compliance; if so, it is unclear to us why the permittee would be required to estimate a value that wasn't useful in demonstrating compliance. In any case, we ask that DEQ please clarify this point.
- Response 2:** DEQ also thanks the commenter for requesting the clarification. Permit Condition 2.19 has been revised to remove reference to TAPs and clarify how to calculate solids content, VOC content, and HAPs content when the amounts cannot be determined from the information in the Material Safety Data Sheets (MSDS or SDS).
- Comment 3:** Table 9 in the Statement of Basis lists the facility classification associated with regulated air pollutants. Lead is included in this table, but emissions values are listed as unknown. We request that DEQ elaborate on why lead emissions from this facility have not been quantified.
- Response 3:** There is no lead in the emissions inventory provided with the application, nor is lead expected to be present in modern paint formulations. Therefore, the classification for lead has been changed to B, denoting the facility as a minor source for the pollutant with no permit restrictions relevant to lead (see Table 9 of the SOB).

Appendix
Public Comments Submitted for
Permit to Construct
P-2010.0144



IDAHO
CONSERVATION
LEAGUE

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1/30/18

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Submitted via email: tessa.stevens@deq.idaho.gov and tom.burnham@deq.idaho.gov

RE: PTC Modifications for Lippert Components, Twin Falls

Dear Ms. Stevens and Mr. Burnham,

Thank you for the opportunity to comment on the proposed modifications to Lippert Component's air quality PTC.

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and public lands—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality.

Our detailed comments are provided following this letter. Please do not hesitate to contact me at 208-345-6933 ext. 23 or ahopkins@idahiconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter. After reviewing and considering our comments we request that DEQ please provide responses to the issues detailed in our comments.

Sincerely,

A handwritten signature in black ink that reads "Austin Hopkins".

Austin Hopkins
Conservation Associate

RE: Idaho Conservation League comments on PTC Modifications for Lippert Components, Twin Falls

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Approved Daily Usage Scenario

Tables 2.3 and 2.7 in the draft permit lists the various coating materials and their associated daily and annual usage limits. Coating materials Patriot 3-1549, Patriot 6-KMA-0210, Sherwin Williams F75BC500, and Cloverdale Paint 792512 all share a daily usage limit of 46.6 gal/day and an annual usage limit of 17,000 gal/yr. It's unclear from the tables if the prescribed limits apply to each coating material individually or if the values limit the cumulative use of all coating materials combined. We recommend including footnotes to Table 2.3 and Table 2.7 clarifying this issue.

Conflicting Compliance Instructions

To estimate the coating TAP emissions, Permit Condition 2.17 includes the following instructions, "When the TAP content is below detection and cannot be determined from SDS or other documentation, the TAP content shall be assumed to be the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions." However, later on in the draft permit, the fifth bullet point under Permit Condition 2.19 states: "When the solids content, VOC content, or TAP content cannot be determined from SDS or other documentation, the density of the coating (lb/gal) shall be used when estimating emissions."

It seems that there may be a discrepancy here with regards to scenarios where TAP content is undeterminable from the SDS. Permit Condition 2.17 instructs the permittee to use a TAP content of 1% of the coating density, whereas 2.19 requires the permittee to use 100% of the coating density when TAP content is unknown. Perhaps the difference is related to the difference between estimating emissions and demonstrating compliance; if so, it is unclear to us why the permittee would be required to estimate a value that wasn't useful in demonstrating compliance. In any case, we ask that DEQ please clarify this point.

Lead Emissions

Table 9 in the Statement of Basis lists the facility classification associated with regulated air pollutants. Lead is included in this table, but emissions values are listed as unknown. We request that DEQ elaborate on why lead emissions from this facility have not been quantified.