

# **Statement of Basis**

**Permit to Construct No. P-2015.0045  
Project ID 62621**

**Mikey's Graphics Inc. - Jerome  
Jerome, Idaho**

**Facility ID 053-00034**

**Final**

**January 28, 2022  
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Permit Writer**

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

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

Btu	British thermal units
CFM	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EL	screening emission levels
ft <sup>3</sup>	cubic feet
GACT	Generally Available Control Technology
gal/min	gallons per minute
HAP	hazardous air pollutants
HMDI	hexamethylene diisocyanate
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	pound
lb/hr	pounds per hour
MACT	Maximum Achievable Control Technology
micron	micrometer
MMBtu	million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
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
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>
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
VOC	volatile organic compounds
'	feet
“	inches

## **FACILITY INFORMATION**

### ***Description***

Mikey's Graphics Inc. – Jerome refurbishes propane tanks and truck trailers and frames. The tanks, trailers and frames first undergo abrasive blasting to prepare their surfaces for spray coating. The blasting is performed in a blasting room equipped with filters or, if size allows, in an enclosed blasting cabinet. Prior to blasting, residual propane is flared off. Coating is performed in a spray paint booth using airless paint guns.

### ***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 8, 2016            P-2015.0045, Initial PTC for a propane tank and truck frame refurbishing and painting facility, Permit status (A, but will become S upon issuance of this permit)

### ***Application Scope***

This PTC is for a minor modification at an existing minor facility. The applicant has proposed to modify its permit to allow additional flexibility with its coating usage.

### ***Application Chronology***

January 8, 2021	DEQ sent a notice to comply to the facility, which included notification that a PTC was required (NTC-2021.0001).
May 3, 2021	DEQ received an application and an application fee.
May 17 – June 1, 2021	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
June 10, 2021	DEQ determined that the application was incomplete.
July 13, 2021	DEQ received supplemental information from the applicant.
August 12, 2021	DEQ determined that the application was incomplete.
October 14, 2021	DEQ received supplemental information from the applicant.
November 11, 2021	DEQ determined that the application was complete.
December 28, 2021	DEQ made available the draft permit and statement of basis for peer and regional office review.
January 6, 2022	DEQ made available the draft permit and statement of basis for applicant review.
January 20, 2022	DEQ received the permit processing fee.
January 28, 2022	DEQ issued the final permit and statement of basis.

## TECHNICAL ANALYSIS

### *Emissions Units and Control Equipment*

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source ID No.	Sources	Control Equipment
	<p><u>Paint Spray Booth(s):</u>            Manufacturer: Col-Met Engineered Finishing            Model: EIB 12-08-26-PT</p> <p>Note: the number of booths installed at the facility is not limited by this permit</p> <p><u>Coating Spray Gun(s):</u>            Manufacturer(s): Grace            Model(s): Magnum ports 19/Pro LTS 19            Type: Airless            Rated Capacity: 0.38 gal/min            Transfer Efficiency: 65% or greater</p>	<p><u>Paint Spray Booth(s) Filter System:</u>            Booth Types: special floor style, non-pressurized industrial filter cross flow</p> <p>Particulate Filtration Method: dry filter</p> <p>Paint Booth Dimensions: 26'×12'×8'</p> <p>Exhaust System: 30" tube axial in-line exhaust fan (9,600 CFM @ ½ static pressure)</p> <p>Exhaust Chamber: industrial style exhaust chamber with two 20"×20"×2" filter cells</p> <p>Filter Manufacturer(s): Exhaust filters are a fiberglass 'paint arrestor pad' made specifically for the collection of paint overspray. Filters are UL rated Class 2, with control efficiency of 98% (for overall control efficiency of 99.96%).</p>
	Fully enclosed blasting cabinet for surface preparation of 500-gallon or smaller propane tanks, in which most of the total surface preparations occur.	Four nanofiber media cartridges with net control efficiency of 99.999% (down to one micron).
	<p><u>Blasting room for surface preparation of equipment larger than a 500-gallons propane tank</u></p> <p><u>Sand Blaster</u>            Manufacturer: Pirate Brand            Model: 6.5 ft<sup>3</sup> SPR series            Rated Capacity: 3,000 lb/hr</p> <p>Blasting Media: Crushed Glass or Kleen Blast</p>	<p>Dry Abrasive Blast Room Filter System:            Cartridge Style Dust Collection System            Manufacturer: AM-14983            Model: #FFBW            Control Efficiency: 99.8% down to 0.5 micron</p>
	<p><u>Propane Flare</u>            Built by Owner            Capacity: 0.89 MMBtu/hr            Date of Construction: August 2007</p>	None

### ***Emissions Inventories***

#### **Potential to Emit**

IDAPA 58.01.01 defines Potential to Emit 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 hours 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 emissions is state or federally enforceable. Secondary emissions do not count in determining the potential to emit of a facility or stationary source.

Using this definition of Potential to Emit an emission inventory was developed for the propane flare, surface preparation (abrasive blasting), and spray-painting operations at the facility. The assumptions and methods used to develop the emission inventory are presented below.

For the propane flare:

- Emissions from the propane flare were calculated by the applicant using a DENR LPG Combustion Emissions Calculator and assuming:
  - 0.89 MMBtu/hr flare capacity
  - 8,760 hr/yr of operation, so that no operating, monitoring, or recordkeeping will be required to demonstrate compliance with emission estimates.
  - A heating value of LPG equal to 91,000 Btu/gal.
- The applicant submitted calculations were verified by DEQ using the same assumptions listed above and AP-42 emission factors (Table 1.5-1).

For surface preparation of propane tanks smaller than 500 gallons:

- Blasting occurs in a fully enclosed cabinet with four parallel nanofiber media cartridges achieving net 99.999% control efficiency.
- Emissions from this blast cabinet are ignored due to their enclosed nature and the high capture rate of the filter system.

For surface preparation of propane tanks larger than 500 gallons:

- Blasting media is used at a rate of 1,272 lb/day and 330,720 lb/yr.
- Blasting occurs in a prepared room with filtration equipment achieving net 99.8% control efficiency.
- Emission factors from AP-42, Table 13.2.6-1 (for sand blasting of mild steel panels) apply. These emission factors are 13 lb PM<sub>10</sub> and 1.3 lb PM<sub>2.5</sub> per 1,000 lb of blast media.

For spray painting of prepared tanks and truck assemblies:

- Material usage rates of 11.6 gallons per day was applied for all spray applied materials except for Carboquick 200, for which a usage rate of 10 gallons per day was applied.
- Painting occurs in spray paint booth equipped with a filtration system that achieves 99.96% control efficiency.
- Paints are sprayed using airless spray guns able to achieve 65% transfer efficiency of the solids content of the paint.
- A consumption factor of 85% is applied to emissions of hexamethylene diisocyanate to account for consumption of this ingredient during paint curing.
- To determine the short-term VOC emissions rate in lb/hr, the maximum VOC density was identified out of all materials used at the facility. This was multiplied by the usage rate identified above (11.6 lb/day) and divided by the averaging period (24 hr/day).
- To calculate the annual VOC emission rate, the maximum VOC density (lb/gal) was multiplied by the usage rate (11.6 lb/day) and the number of operating days per year (260 day/yr), and then divided by 2000 lb/T.
- To determine the short-term PM emission rate in lb/hr, the maximum solids density was identified out of all materials used at the facility. This was multiplied by the usage rate identified above (11.6 lb/day), and by one minus the transfer efficiency (1 – 0.65) and one minus the filter control efficiency (1 – 0.9996), and then divided by the averaging period (24 hr/day).
- To determine the short-term PM emission rate, the maximum solids density out of all materials used at the facility was identified. This was multiplied by the usage rate identified above (11.6 lb/day), the number of operating days per year (260 day/yr), and by one minus the transfer efficiency (1 – 65%) and one minus the filter control efficiency (1 – 99.96%), and then divided by 2000 lb/T.

- To determine the annual HAP emissions rate, the maximum densities of HAPs were identified out of all materials used at the facility. These were multiplied by the usage rate identified above (11.6 lb/gal or 10 lb/gal if the material with the maximum HAP density was Carboquick 200), the number of operating days per year (260 day/yr). Additionally, transfer efficiency, isocyanate consumption, or particulate control factors were applied as appropriate.
- To determine the TAP emissions rates in lb/hr, the maximum densities of TAPs were identified out of all materials used at the facility. These were multiplied by the usage rate identified above (11.6 lb/gal or 10 lb/gal if the material with the maximum TAP density was Carboquick 200) and divided by the averaging period (24 hr/day). Additionally, transfer efficiency, isocyanate consumption, or particulate control factors were applied as appropriate. No carcinogenic TAPs were present in any paint; therefore, an annual averaging was not necessary.
- In instances where the maximum HAP or TAP density corresponded to Carboquick 200, the Carboquick 200 specific usage rate of 10 gal/day was substituted for the otherwise 11.6 gal/day limit. In these instances, the product of the maximum HAP/TAP density and 10 gal/day was greater than the product of the next greatest HAP/TAP density and 11.6 gal/day. Therefore, it was appropriate to substitute the Carboquick specific usage limit because it resulted in an increase in estimated HAP/TAP emissions.

### **Uncontrolled Potential to Emit**

Using the definition of Potential to Emit, uncontrolled Potential to Emit is then 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 hours of operation or on the type or amount of material combusted, stored or processed, shall **not** be treated as part of its design **since** the limitation or the effect it would have on emissions **is not** state or federally enforceable.

The uncontrolled Potential to Emit is used to determine if a facility is a “Synthetic Minor” source of emissions. Synthetic Minor sources are facilities that have an uncontrolled Potential to Emit for regulated air pollutants or HAP above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for regulated air pollutants as submitted by the Applicant and verified by DEQ staff. See Appendix A for a detailed presentation of the calculations and the assumptions used to determine emissions for each emissions unit. The assumptions and methods used to determine uncontrolled PTE are presented below:

For the Flare:

- Since operation of the flare is not controlled by an external control device uncontrolled PTE from the flare is set equal to PTE.

For surface preparation of propane tanks larger than 500 gallons:

- Uncontrolled emissions from the blasting room were determined by ignoring the control efficiency of room’s the filter system.

For spray painting of prepared tanks and truck assemblies:

- Uncontrolled emissions were estimated by scaling controlled emissions up from 260 day/yr to 365 day/yr (multiplying by 1.40) and ignoring the control efficiency of the paint booth filter system.

**Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Flare	0.030	0.030	0.0043	0.56	0.32	0.043
Abrasive Blasting	2.15	0.215	-	-	-	-
Spray Painting Booth	16.4	16.4	-	-	-	14.5
<b>Total, Point Sources</b>	<b>18.6</b>	<b>16.6</b>	<b>0.0043</b>	<b>0.56</b>	<b>0.32</b>	<b>14.5</b>

The following table presents the uncontrolled Potential to Emit for HAP pollutants.

**Table 3 UNCONTROLLED POTENTIAL TO EMIT FOR HAZARDOUS AIR POLLUTANTS**

Hazardous Air Pollutants	PTE (T/yr)
Ethyl benzene	1.01
Hexamethylene diisocyanate	0.0081
Methanol	5.50
Methyl ethyl ketone	4.43
Toluene	6.81
<b>Xylene</b>	<b>9.20</b>
<b>Total<sup>(a)</sup></b>	<b>12.3</b>

(a) Total HAP is based on allowed usage of material with maximum total HAP composition, not on sum of individual HAP emission rates.

**Pre-Project Potential to Emit**

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project.

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

**Table 4 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub>		PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>
Flare	-	0.0298	-	0.0298	-	0.00063	-	0.553	-	0.319	-	0.0425
Abrasive Blasting	-	0.0043	-	0.0004	-	-	-	-	-	-	-	-
Spray Painting Booth	-	0.00464	-	0.00601	-	-	-	-	-	-	-	37.3
<b>Pre-Project Totals</b>	<b>-</b>	<b>0.039</b>	<b>-</b>	<b>0.036</b>	<b>-</b>	<b>0.00063</b>	<b>-</b>	<b>0.55</b>	<b>-</b>	<b>0.32</b>	<b>-</b>	<b>37.3</b>

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

**Post Project Potential to Emit**

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

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



**Table 5 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub>		PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>	lb/hr <sup>(a)</sup>	T/yr <sup>(b)</sup>
Flare	0.0068	0.030	0.0068	0.030	0.00014	0.0043	0.126	0.557	0.072	0.321	0.0097	0.043
Abrasive Blasting	0.0014	0.0043	0.00014	0.00043	-	-	-	-	-	-	-	-
Spray Painting Booth	0.0045	0.0047	0.0045	0.0047	-	-	-	-	-	-	3.3	10.3
<b>Post Project Totals</b>	<b>0.013</b>	<b>0.039</b>	<b>0.011</b>	<b>0.035</b>	<b>0.00014</b>	<b>0.0043</b>	<b>0.126</b>	<b>0.557</b>	<b>0.072</b>	<b>0.321</b>	<b>3.31</b>	<b>10.34</b>

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

**Change in Potential to Emit**

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

**Table 6 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub>		PM <sub>2.5</sub>		SO <sub>2</sub>		NO <sub>x</sub>		CO		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Pre-Project Potential to Emit	-	0.039	-	0.036	-	0.00063	-	0.55	-	0.32	-	37.3
Post Project Potential to Emit	0.013	0.039	0.011	0.035	0.00014	0.0043	0.126	0.557	0.072	0.32	3.31	10.34
<b>Changes in Potential to Emit</b>	<b>0.013</b>	<b>0</b>	<b>0.011</b>	<b>0</b>	<b>0.00014</b>	<b>0.0037</b>	<b>0.126</b>	<b>0.007</b>	<b>0.072</b>	<b>0</b>	<b>3.31</b>	<b>-27.0</b>

**Non-Carcinogenic TAP Emissions**

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

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

**Table 7 PRE- AND POST PROJECT POTENTIAL TO EMIT FOR NON-CARCINOGENIC TOXIC AIR POLLUTANTS**

Non-Carcinogenic Toxic Air Pollutants	Pre-Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Post Project Annual Average Emissions Rates for Units at the Facility (lb/hr)	Change in Annual Average Emissions Rates for Units at the Facility (lb/hr)	Non-Carcinogenic Screening Emission Level (lb/hr)	Exceeds Screening Level? (Y/N)
1-Methoxy-2-Propanol Acetate	0.10	0.206	0.106	24	No
Aluminum Oxide <sup>(a)</sup>	2.12E-03	1.63E-03	-0.0005	0.667	No
Acetone	0.04	0.496	0.456	119	No
Butyl Acetate	-	0.000	0	47.3	No
Calcium Carbonate	-	2.89E-05	2.89E-05	0.667	No
Calcium Oxide <sup>(a)</sup>	1.59E-02	6.53E-03	-0.00944	0.133	No
Carbon Black	2.26E-05	5.78E-05	3.52E-05	0.23	No
Divinyl Benzene	-	0.404	0.404	3.33	No
Ethyl Acetate	0.00032	0.191	0.19068	93.3	No
Ethyl Benzene	0.08	0.206	0.126	29	No
Hexamethylene Diisocyanate	-	1.86E-03	0.00186	0.002	No
Hexylene Glycol	-	0.206	0.206	0.806	No
Iron Oxide <sup>(a)</sup>	1.06E-03	7.84E-03	0.00671	0.333	No
Isopropyl Alcohol	0.05	0.222	0.172	65.3	No
Magnesium Oxide <sup>(a)</sup>	1.06E-03	1.12E-03	5E-05	0.667	No
Methanol	0.10	1.256	1.156	17.3	No
Methyl Amyl Ketone	0.00070	0.412	0.4113	15.7	No
Methyl Ethyl Ketone	0.03	1.011	1.011	39.3	No
Methyl Propyl Ketone	-	0.348	0.348	46.7	No
n-Butanol	0.03	0.115	0.085	10	No
n-Butyl Acetate	0.02	0.458	0.438	47.3	No
Nitrous Oxide <sup>(b)</sup>	0.024	0.024	0	6	No
Quartz (Silicon Dioxide) <sup>(a)</sup>	1.14E-03	1.32E-03	1.75E-04	0.0067	No
Stoddard Solvent	0.08	0.206	0.126	35	No
Toluene	0.51	1.554	1.044	25	No
Xylene	0.79	2.099	1.309	29	No
Zinc	0.00028	1.25E-03	0.00097	0.667	No
Zinc Oxide	2.84E-06	1.25E-05	9.66E-06	0.667	No

(a) Al<sub>2</sub>O<sub>3</sub>, CaO, Fe<sub>2</sub>O<sub>3</sub>, MgO, and SiO<sub>2</sub> are emitted from blasting (SiO<sub>2</sub> is also emitted from the paint booth).

(b) N<sub>2</sub>O<sub>3</sub> is emitted from the propane flare.

All changes in emissions rates for non-carcinogenic TAP were below EL (screening emissions level) as a result of this project, Therefore, modelling analysis is not required for this project.

To reduce the emission rate of Hexamethylene Diisocyanate (HMDI) below its EL, the permittee took a voluntary usage restriction on a single coating material (Carboquick 200). Since HMDI is a HAP, and because the spray coating of truck trailers is addressed by 40 CFR 63 Subpart HHHHHH, it may be unclear why this usage reduction was necessary. To address this confusion, the permittee specified that the majority of their coating operations involves the coating of propane tanks, which are not mobile equipment and not addressed by Subpart HHHHHH. Therefore, to avoid the having to discriminate between operations involving propane tanks versus truck trailers, for the purpose of TAP compliance, all coating usage was assumed to go toward coating propane tanks. Furthermore, since these are 24-hour averaged TAPs and because coating usage would not likely be split between propane tanks and truck trailers in a single day, this assumption makes sense.

**Carcinogenic TAP Emissions**

No carcinogenic TAPs are emitted at this facility.

## Post Project HAP Emissions

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

**Table 8 HAZARDOUS AIR POLLUTANTS EMISSIONS POTENTIAL TO EMIT SUMMARY**

<b>Hazardous Air Pollutants</b>	<b>PTE (T/yr)</b>
Ethyl benzene	0.72
Hexamethylene diisocyanate	0.0058
Methanol	3.92
Methyl ethyl ketone	3.15
Toluene	4.85
<b>Xylene</b>	<b>6.55</b>
<b>Totals<sup>(a)</sup></b>	<b>8.77</b>

a) Total HAP is based on allowed usage of material with maximum total HAP composition, not on sum of individual HAP emission rates.

## **Ambient Air Quality Impact Analyses**

An ambient air quality impact analysis was not required for this project.

## **REGULATORY ANALYSIS**

### **Attainment Designation (40 CFR 81.313)**

The facility is located in Jerome County, which is designated as attainment or unclassifiable for PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

### **Facility Classification**

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

- A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.
- SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.
- SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.
- B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.
- UNK = Class is unknown.

For All Other Pollutants:

- A = Use when permitted emissions of a pollutant are > 100 T/yr.
- SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.
- SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and

permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 100 T/yr major source threshold.

UNK = Class is unknown.

**Table 9 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION**

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM <sub>10</sub>	18.6	0.039	100	B
PM <sub>2.5</sub>	16.6	0.035	100	B
SO <sub>2</sub>	0.0043	0.0043	100	B
NO <sub>x</sub>	0.56	0.56	100	B
CO	0.32	0.32	100	B
VOC	14.5	10.34	100	B
HAP (single)	9.20	6.55	10	B
Total HAPs	12.3	8.77	25	B

**Permit to Construct (IDAPA 58.01.01.201)**

IDAPA 58.01.01.201 ..... Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the modified emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

**Tier II Operating Permit (IDAPA 58.01.01.401)**

IDAPA 58.01.01.401 ..... Tier II Operating Permit

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

**Fugitive Dust (IDAPA 58.01.01.650)**

IDAPA 58.01.01.650 ..... Rules for Control of Fugitive Dust

The permittee is subject to the State of Idaho requirement that all reasonable precautions be taken to prevent the generation of fugitive dust. This requirement is assured by Permit Condition 2.1

**Odors**

IDAPA 58.01.01.775 ..... Rules for Control of Odors

The sources at this facility are subject to the State of Idaho Rules for Control of Odors. No person shall allow, cause or permit the emission of odorous gases, liquids or solids into the atmosphere in such quantities as to cause air pollution. This requirement is assured by Permit Condition 2.2.

**Visible Emissions (IDAPA 58.01.01.625)**

IDAPA 58.01.01.625 ..... Visible Emissions

The sources of PM emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Condition 2.3.

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

IDAPA 58.01.01.301 ..... Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

**PSD Classification (40 CFR 52.21)**

40 CFR 52.21 ..... Prevention of Significant Deterioration of Air Quality

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

**NSPS Applicability (40 CFR 60)**

Because the facility spray coats propane tanks and truck trailers, it may be subject to the following subparts under 40 CFR 60.

- Subpart MM – Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations  
40 CFR 60, Subpart MM ..... Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations
- § 60.390 ..... Applicability and designation of affected facility.

Section (a) states that this subpart applies to facilities in an automobile or light-duty truck assembly plant. Since the permittee is not located at an automobile or light-duty truck assembly plant, they are not subject to this subpart.

**NESHAP Applicability (40 CFR 61)**

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

**MACT/GACT Applicability (40 CFR 63)**

Because the facility spray coats propane tanks and truck trailers, it may be subject to the following subparts under 40 CFR 63.

- 40 CFR 63 Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories
- 40 CFR 63 Subpart HHHHHH – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

40 CFR 63, Subpart XXXXXX ..... National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories

§ 63.11514 ..... Am I subject to this subpart?

Section (a) states a facility is subject to this subpart if it is primarily engaged in any one of the nine source categories listed in paragraphs (a)(1) through (9). The facility is not primarily engaged in any of the listed source categories, therefore it is not subject to this subpart.

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

§ 63.11170..... Am I subject to this subpart?

The facility is an area source of HAP that spray coats mobile equipment and does not use Methylene Chloride to strip paint. This permitting action does not alter the applicability of this subpart, except that since the previous permit issuance, the permittee has petitioned for exemption in accordance with §63.11170(a)(2). This petition was approved by DEQ and the conditions for continued exemption are now explained in Permit Condition 4.16.

### ***Permit Conditions Review***

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

#### Surface Preparation (Abrasive Blasting)

##### Permit Condition 3.3

This is a new permit condition, added to specify emission limits corresponding to the estimates presented in this statement of basis.

##### Permit Condition 3.6

This permit condition corresponds to permit condition 3.5 of the previous permit. Since the blasting cabinet has already been installed, this permit condition was modified to remove language requiring that it be installed within 90 days of permit issuance and to instead simply require that it be operated to control emissions from blasting operations on propane tanks smaller than 500 gallons.

##### Permit Condition 3.7

This permit condition corresponds to permit condition 3.6 of the previous permit. Since the air filtration equipment has already been installed for the blasting room, this permit condition was modified to remove language requiring that in be installed and to instead simply require that it be operated to control emissions from blasting operations on propane tanks larger than 500 gallons, and other equipment of comparable size.

##### Permit Condition 3.11

This permit condition corresponds to permit condition 3.10 of the previous permit. Since the Baghouse/Filter System Procedures document has already been developed, this permit condition was modified to remove language requiring that it be developed within 60 days of permit issuance and to instead simply require that it be maintained.

#### Coating Operations/Spray Paint Booth

##### Permit Condition 4.3

This is a new permit condition, added to specify emission limits corresponding to the estimates presented in this statement of basis.

##### Permit Condition 4.4

This permit condition combines permit conditions 4.3 and 4.4 of the previous permit. These conditions were modified to change the weekly usage limit to a daily limit (58 gal/wk →11.6 gal/day), with a reduced usage for Carboquick 200, to add to additional coatings (Carboquick 200 and Imron 3.5+ Poly RF) to the list of approved coatings, and to remove the provisions regarding respective equivalent coatings (these are replaced by the Alternate Daily Coating Usage Scenario boilerplate conditions).

##### Permit Condition 4.5

This is a new permit condition. It limits annual days of operation to 260. Since the facility is synthetic minor for HAP and there are no annual limits on material usage, this condition is warranted.

#### Permit Condition 4.6

This permit condition corresponds to permit condition 4.5 of the previous permit. Since the paint booth is already equipped with a filtration system, this permit condition was modified to remove the language requiring that this occur within 90 days of permit issuance.

#### Permit Conditions 4.7 through 4.10

These are new permit conditions. They were added at the request of the permittee to provide more flexibility for coating usage.

#### Permit Condition 4.11

This permit condition corresponds to permit condition 4.6 of the previous permit. It was modified to specify that daily (not weekly) records are required and to include the standard language regarding material usage recordkeeping for Alternate Coating Material Usage Scenarios.

#### Permit Condition 4.12

This is a new permit condition. It was added to require that the permittee monitor and maintain records in support of each alternate daily coating usage scenario, including which scenario is used, the corresponding proposed daily limits, and manufacturer specifications of engineering assumptions relied upon in emission calculations.

#### Permit Condition 4.13

This permit condition corresponds to permit condition 4.7 of the previous permit. It was modified to remove language referring to 'respective equivalent' coating materials and to add a requirement that the permittee maintain purchase records of all coating materials used at the facility.

#### Permit Condition 4.14

This is a new permit condition. It was added to require that the permittee keep submit a report each calendar year of all new Alternate Coating Material Usage Scenarios developed that have not already been approved by DEQ.

#### Permit Condition 4.15

This is a new permit condition. It was added to ensure compliance with permit condition 4.5 by requiring recordkeeping of days of operation each 12-month rolling period.

#### Permit Condition 4.17

This permit condition corresponds to permit condition 4.9 of the previous permit. Since the Baghouse/Filter System Procedures document has already been developed, this permit condition was modified to remove language requiring that it be developed within 60 days of permit issuance and to instead simply require that it be maintained.

## **PUBLIC REVIEW**

### ***Public Comment Opportunity***

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there was not a request for a public comment period on DEQ's proposed action. Refer to the chronology for public comment opportunity dates.

## **APPENDIX A – EMISSIONS INVENTORIES**



# Flare

Flare Capacity (MMBtu/hr): 0.89

Heat Value (MMBtu/gal): 0.091

Annual Usage (gal/yr): 9000

	Emission Factor		Emission Rate	
	lb/1000 gal	lb/hr	T/yr	T/yr based on 8760 (hr/yr)
PM	0.7	0.00685	0.0032	0.0300
SO2	0.1	0.00098	0.0005	0.0043
NOX	13	0.12714	0.0585	0.5569
CO	7.5	0.07335	0.0338	0.3213
VOC	1	0.00978	0.0045	0.0428

# Abrasive Blasting

Abrasive Usage (lb/yr): 330720  
Abrasive Usage (lb/day): 1272  
Control Efficiency: 99.8%

	Emission Factor (lb/1000 lb)	Emission Rate		
		(lb/hr)	T/yr	Uncontrolled T/yr
PM	27	0.00286	0.0089	4.46
PM10	13	0.00138	0.0043	2.15
PM2.5	1.3	0.00014	0.0004	0.21

	Weight %	lb/hr	EL	Exceeds EL
Al2O3	5.7%	1.63E-04	0.667	No
CaO	22.8%	6.53E-04	0.133	No
Fe2O3	27.4%	7.84E-04	0.333	No
MgO	3.9%	1.12E-04	0.667	No
SiO2	38.1%	1.09E-03	0.0067	No

# Spray Coating

Coating Material	Individual Part Properties					Mixed Properties				
	Specific Gravity	Density	Percent VOC	VOC Density	PM Density	Mix Ratios		Density	VOC Density	PM Density
	(lb/gal)	(lb/gal)	(lb/gal)	(lb/gal)	(lb/gal)	Vol. %	Wgt. %	(lb/gal)	(lb/gal)	(lb/gal)
Lacquer Thinner SW R7K115	0.82	6.84	100%	6.84	0.00	-	-	6.8	6.8	0.00
2025 Acrylic Mod Clear Base EN	0.93	7.76	61.2%	4.75	3.01	-	-	7.8	4.7	3.01
V 2131 Shop Coat Primer	1.41	11.76	20.6%	2.42	9.34	-	-	11.8	2.4	9.34
Carbothane 134 HG Part A	1.28	11.87	20.9%	2.48	9.39	80%	84%	11.4	3.29	9.0
Carbothane 134 HG Part B	1.12	9.34	-	6.55	7.56	20%	16%	-	-	-
Carbozinc 859 Part A	1.3	10.56	-	3.11	7.44	44%	19%	-	-	-
Carbozinc 859 Part B	0.88	7.30	-	5.39	1.91	25%	7%	24.8	2.7	22.1
Carbozinc 859 Part C	7.109	59.20	-	0	59.20	31%	74%	-	-	-
Carboquick 200 Part A	1.21	10.09	-	2.05	8.04	67%	69%	9.7	2.1	7.6
Carboquick 200 Part B	1.07	8.92	-	2.05	6.87	33%	31%	-	-	-
Imron 3.5 + Poly RF Part A	0.999	8.33	49.1%	4.09	4.24	80%	77%	16.6	3.3	5.3
Imron 3.5 + Poly RF Part B	-	9.75	0.1%	0.00	9.25	20%	23%	-	-	-

Carboquick Reduced Usage (gal/day) 10  
 All Other Usage (gal/day): 11.6  
 Operation (day/wk): 5  
 Averaging Period (hr): 24  
 Transfer Efficiency: 65%  
 Particulate Control Efficiency: 99.96%  
 Diisocyanate Reaction Factor: 85%

hr/day day/yr hr/yr  
 Controlled 8 260 2080  
 Uncontrolled 8 365 2920

Controlled PTE		
lb/hr	T/yr	
PM	0.00449	0.00467
VOC	3.3	10.3
Individual HAP	-	6.55
Total HAP	-	8.77

Uncontrolled PTE	
T/yr	
PM	16.4
VOC	14.5
Individual HAP	9.2
Total HAP	12.3

CAS No.	1-Methoxy-2-Propanol Acetate	Acetone	Aliphatic Diol (Hexylene Glycol)	Aromatic Hydrocarbon (Divinyl Benzene)	Butyl Acetate	Calcium Carbonate	Carbon Black	Cumene	Ethyl Acetate	Ethyl Benzene	Hexamethylene Diisocyanate	Isopropyl Alcohol	Methanol	Methyl Amyl Ketone	Methyl Ethyl Ketone	Methyl Propyl Ketone	n-Butanol	n-Butyl Acetate	Quartz	Stoddard Solvent	Titanium Dioxide	Toluene	Xylene	Zinc	Zinc Oxide
585 TAP	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1
586 TAP	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
HAP	0	0	0	0	0	0	0	1	0	1	1	0	1	0	0	0	0	0	0	0	0	1	1	0	0
PM	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	0	1	0	1	0	0	1	1
<b>Mass Percent of Individual Parts</b>																									
Lacquer Thinner SW R7K115	15%											38%											47%		
2025 Acrylic Mod Clear Base EN	5%											5%											56%		
V 2131 Shop Coat Primer	5%											10%											14%		
Carbothane 134 HG Part A	5%											5%											6%		
Carbothane 134 HG Part B	5%											1%											10%		
Carbozinc 859 Part A	5%											1%											5%		
Carbozinc 859 Part B	5%											1%											15%		
Carbozinc 859 Part C	5%											1%											25%		
Carboquick 200 Part A	10%											1%											5%		
Carboquick 200 Part B	10%											1%											15%		
Imron 3.5 + Poly RF Part A	28%											3%											50%		
Imron 3.5 + Poly RF Part B	2%											7%											100%		
<b>Mass Percent of Mixed Parts</b>																									
Lacquer Thinner SW R7K115	-	15%	-	-	-	-	-	-	-	-	-	-	38%	-	-	-	-	-	-	-	-	-	-	-	-
2025 Acrylic Mod Clear Base EN	-	-	-	5%	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
V 2131 Shop Coat Primer	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6%	-	-	-	-	-	-	-	-	-	-
Carbothane 134 HG	4.2%	-	4.2%	0.8%	-	4.2%	8.4%	-	4.2%	0.2%	-	-	-	-	-	-	9.2%	29.2%	4.2%	33.4%	8.4%	12.5%	-	-	-
Carbozinc 859	0.9%	-	-	-	-	-	0.2%	-	0.2%	-	1.8%	-	-	0.9%	-	0.9%	-	-	-	4.2%	2.8%	8.3%	1.3%	74.0%	0.7%
Carboquick 200	-	-	-	10.0%	-	-	6.9%	-	0.7%	0.3%	-	-	-	25.0%	-	-	3.1%	-	-	-	34.7%	-	-	-	-
Imron 3.5 + Poly RF	-	-	-	-	22%	-	2%	-	2%	-	-	-	-	5%	-	-	-	-	-	-	-	-	-	-	-
<b>Density (lb/gal)</b>																									
Lacquer Thinner SW R7K115	-	1.03	-	-	-	-	-	-	-	-	-	-	2.60	-	-	-	-	-	-	-	-	3.21	-	-	5.81
2025 Acrylic Mod Clear Base EN	-	-	-	0.39	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.34	-	-	5.81
V 2131 Shop Coat Primer	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.72	-	-	-	-	-	-	1.70	-	-	5.81
Carbothane 134 HG	0.47	-	0.47	0.09	-	0.47	0.95	-	0.47	0.02	-	-	-	-	-	-	1.04	3.32	0.47	3.80	0.95	1.42	-	-	2.87
Carbozinc 859	0.23	-	-	-	-	-	0.05	-	0.05	-	0.46	-	-	0.23	-	0.23	-	-	-	0.70	2.07	0.32	18.37	0.18	2.68
Carboquick 200	-	-	-	0.97	-	-	0.67	-	0.07	0.03	-	-	-	2.43	-	-	0.30	-	-	-	3.36	-	-	-	2.52
Imron 3.5 + Poly RF	-	-	-	-	3.61	-	0.31	-	0.39	-	-	-	0.85	-	-	-	-	-	-	-	-	-	-	-	0.00
Max. Density (lb/gal):	0.47	1.03	0.47	0.97	3.61	0.47	0.95	0.00	0.39	0.47	0.0297	0.46	2.60	0.85	2.43	0.72	0.23	1.04	3.32	0.47	3.80	3.21	4.34	18.37	0.18
Max. Density from Carboquick?:	0	0	0	1	0	0	0	0	0	0	1	0	0	1	0	0	0	0	0	0	0	0	0	0	0
TAP Emission Rate (lb/hr):	<b>0.229</b>	<b>0.496</b>	<b>0.229</b>	<b>0.404</b>	<b>1.743</b>	<b>0.000</b>	<b>0.000</b>	<b>0.000</b>	<b>0.191</b>	<b>0.229</b>	<b>0.00186</b>	<b>0.221</b>	<b>1.256</b>	<b>0.412</b>	<b>1.011</b>	<b>0.348</b>	<b>0.112</b>	<b>0.504</b>	<b>0.000</b>	<b>0.229</b>	<b>0.000</b>	<b>1.554</b>	<b>2.099</b>	<b>0.001</b>	<b>0.000</b>
EL:	24	119	0.806	3.33	47.30	0.667	0.23	16.63	93.30	29.00	0.002	65.30	17.30	15.70	39.30	46.70	10.00	47.30	0.0067	35.00	25.00	29.00	0.667	0.667	
Percent of EL:	0.96%	0.42%	28.47%	12.14%	3.69%	0.00%	0.03%	0.00%	0.20%	0.79%	92.96%	0.34%	7.26%	2.62%	2.57%	0.74%	1.12%	1.07%	3.36%	0.66%	6.21%	7.24%	0.19%	0.00%	
HAP Emission Rate (T/yr):	-	-	-	-	-	-	-	<b>0.00</b>	-	<b>0.72</b>	<b>0.0058</b>	-	<b>3.92</b>	-	<b>3.15</b>	-	-	-	-	-	-	<b>4.85</b>	<b>6.55</b>	-	-
Uncontrolled HAP (T/yr):	-	-	-	-	-	-	-	0	-	1.01	0.0081	-	5.50	-	4.43	-	-	-	-	-	-	6.80	9.20	-	-

## **APPENDIX B – FACILITY DRAFT COMMENTS**

No facility comments were received for this project.

## **APPENDIX C – PROCESSING FEE**

# PTC Processing Fee Calculation Worksheet

**Instructions:**

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

**Company:** Mikey's Graphics Inc. - Jerome  
**Address:** 424 E 300 S  
**City:** Jerome  
**State:** Idaho  
**Zip Code:** 83338  
**Facility Contact:** Mike Ehrmantraut  
**Title:** Operator  
**AIRS No.:** 238320

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

<b>Emissions Inventory</b>			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO <sub>x</sub>	0.0	0	0.0
SO <sub>2</sub>	0.0	0	0.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	27	-27.0
<b>Total:</b>	0.0	27	<b>-27.0</b>
Fee Due	<b>\$ 1,000.00</b>		

Comments: