Statement of Basis

Permit to Construct No. P-2016.0070
Project ID 61824

Rhino Linings of Canyon County
Caldwell, Idaho

Facility ID 027-00149

Final

December 27, 2016
Dan Pitman, P.E.
Permit Writer

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

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

Description
Rhino Linings of Canyon County is a pickup bed lining and miscellaneous parts lining facility with paint spray booth(s). Traditional painting will not occur. The paint booth(s) is equipped with fiber filtration media for control of particulate emissions. The process includes application of coatings via a paint gun.

Permitting History
This is the initial PTC for a new facility thus there is no permitting history.

Application Scope
This permit is the initial PTC for this facility. The applicant has proposed to permit a spray on bed lining operation. The permit also allows coating of miscellaneous parts within the booth.

Application Chronology

October 24, 2016 DEQ issued a notice of violation for failure to obtain a permit or an exemption
November 28, 2016 DEQ received an application
November 29, 2016 DEQ received an application and processing fee.
December 6 – 21, 2016 DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
December 1, 2016 DEQ made available the draft permit and statement of basis for peer and regional office review.

TECHNICAL ANALYSIS
The facility utilizes fiber filtration media for control of particulate matter emissions from pickup bed lining coating application.

The analysis used to issue this permit relies on the general permit analysis (TRIM record #2011AAG916) for volatile air pollutant emissions (including volatile HAP and TAP) for spray applying pickup bed liner material. It also relies on the chemical composition of bed liner components listed in that document to determine the worst case potential for particulate matter emissions (criteria and toxic air pollutant particulate).
The facility does not use combustion sources to provide heat for product curing.

**Emissions Units and Control Equipment**

<table>
<thead>
<tr>
<th>Source</th>
<th>Control Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Spray booth(s):</strong></td>
<td><strong>Coating spray gun(s):</strong></td>
</tr>
<tr>
<td>The number of booths</td>
<td>Manufacturer: Graco or equivalent</td>
</tr>
<tr>
<td>installed at the facility is not limited by this permit.</td>
<td>Type: HVLP or equivalent unless an exemption from the EPA has been granted for 40 CFR 63, Subpart HHHHHH</td>
</tr>
</tbody>
</table>

**Emissions Inventories**

**Potential to Emit**

IDAPA 58.01.01.006 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.

The analysis used to issue this permit relies on the general permit analysis for emissions that occur from applying bed liners (TRIM record #2011AAG916) with regard to volatile air pollutant emissions. It also relies on the chemical composition of bed liner materials listed in that document to determine the worst case potential for particulate matter emissions (criteria and toxic air pollutant particulate). Particulate matter emissions estimates in this analysis differ from the existing general permit analysis, included in Appendix A, only with respect to the transfer efficiency used to calculate particulate matter emissions and that painting operations do not occur. The existing general permit analysis uses a transfer efficiency of 65% corresponding to the use of HVLP guns. The application for this permit did not designate whether high pressure or low pressure paint guns are used. As demonstrated by the following calculations any transfer efficiency is sufficient to demonstrate compliance with all standards provided the resulting emissions are controlled by a filter with 98% control efficiency.

Worst case particulate emissions from coating material data used in the General Permit (TRIM record #2011AAG916):

- **Density**: 10.24 lb/gal
- **Solids**: 73.8%
- **Use**: 4 gal./day
- **Transfer**: 0% (assumed worst case)
- **Filter**: 98%
- **Silica dioxide**: 1.5%

Emissions Calculations (including a 1.2 safety factor):
PM emissions = (4 gal/day)(day/24hr)(10.24 lb/gal)(0.738)(1-0.98)(1.2) = 0.030 lb/hr
Silica Dioxide = (4 gal/day)(day/24hr)(10.24 lb/gal)(1-0.98)(1.2)(0.015) = 6.14 E-4 lb/hr

Note that the PM emissions are less than the modeling threshold for PM<sub>2.5</sub> (0.054 lb/hr), and silica dioxide emissions are less than the screening emissions level for that TAP (6.7 E-3 lb/hr).

The volatile organic compound and volatile HAP and TAP emission estimates in the general permit analysis for bed liner applications remain unchanged for this permit (TRIM record #2011AAG916). The emission estimates are included in Appendix A.

**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 criteria pollutants or HAPs above the applicable Major Source threshold without permit limits.

The following table presents the uncontrolled Potential to Emit for criteria pollutants as determined by DEQ staff (TRIM record #2011AAG916). For VOC emissions it is assumed that on an annual average basis the source has the capacity to use a total of 8 gallons of coatings per day, for particulate matter operations are assumed to occur 8,760 hours per year. These assumptions are sufficient enough to accomplish the requirement 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 criteria pollutants or HAPs above the applicable Major Source threshold without permit limits.

<table>
<thead>
<tr>
<th>Emissions Unit</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt; T/yr</th>
<th>SO&lt;sub&gt;2&lt;/sub&gt; T/yr</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt; T/yr</th>
<th>CO T/yr</th>
<th>VOC T/yr</th>
<th>Lead lb/quarter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paint spray booth(s)</td>
<td>6.8</td>
<td>0.0</td>
<td>0.0</td>
<td>0.0</td>
<td>20</td>
<td>0.0</td>
</tr>
</tbody>
</table>

When it is presumed that the maximum bed liner coating material usage is 2,920 gallons per year (or 8 gallons per day) the uncontrolled Potential to Emit for HAP pollutants is less than 10 tons per year for any individual HAP and less than 25 tons per year for all HAPs combined.

<table>
<thead>
<tr>
<th>HAP</th>
<th>Emission Rate (lb/hr)&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Emission Rate (T/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hexamethylene Disocyanate</td>
<td>1.0E-3</td>
<td>4.4E-3</td>
</tr>
<tr>
<td>Methylene Disocyanate</td>
<td>2.83E-3</td>
<td>0.012</td>
</tr>
<tr>
<td>Xylene</td>
<td>3.1E-2</td>
<td>0.136</td>
</tr>
</tbody>
</table>

<sup>a</sup> Emission estimates from General Permit analysis (TRIM record #2011AAG916)

**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. This is an existing facility. However, since this is the first time the facility is receiving a permit, pre-project emissions are set to zero for all criteria pollutants.
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.

<table>
<thead>
<tr>
<th>Emissions Unit</th>
<th>PM_{10}</th>
<th>SO_{2}</th>
<th>NO_{X}</th>
<th>CO</th>
<th>VOC</th>
<th>Lead</th>
</tr>
</thead>
<tbody>
<tr>
<td>lb/hr^{a}</td>
<td>T/yr^{b}</td>
<td>lb/hr^{a}</td>
<td>T/yr^{b}</td>
<td>lb/hr^{a}</td>
<td>T/yr^{b}</td>
<td>lb/hr^{a}</td>
</tr>
<tr>
<td>Paint spray booth(s) and/or preparation station(s)</td>
<td>0.03</td>
<td>0.13</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
</tbody>
</table>

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.

Potential to Emit for HAP pollutants is less than 10 tons per year for any individual HAP and less than 25 tons per year for all HAPs combined.

Non-Carcinogenic and Carcinogenic TAPs Potential to Emit

Because of the daily coating material use limits imposed by DEQ, and agreed to by the facility in applying for this Automotive Coating “General Permit”, no ELs specified in IDAPA 58.01.01.585 or 586 are expected to be exceeded by the facility.

Ambient Air Quality Impact Analyses

Because of the daily coating material use limits imposed by DEQ, and agreed to by the facility in applying for this Automotive Coating “General Permit”, it needs to be determined if the PTE for the automotive coating operation exceeds the DEQ modeling guideline thresholds. The following table compares the post-project facility-wide annual emissions to the DEQ modeling guideline thresholds (per the State of Idaho Air Quality Modeling Guideline, September 2013).

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PTE (lb/hr)</th>
<th>DEQ Modeling Guideline Thresholds (lb/hr)</th>
<th>Exceeds Modeling Guideline Threshold?</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM_{10}</td>
<td>0.03 lb/hr</td>
<td>0.22 lb/hr</td>
<td>No</td>
</tr>
<tr>
<td>PM_{2.5}</td>
<td>0.03 lb/hr</td>
<td>0.054 lb/hr</td>
<td>No</td>
</tr>
<tr>
<td>SO_{2}</td>
<td>0.0</td>
<td>0.21 lb/hr</td>
<td>No</td>
</tr>
<tr>
<td>NO_{X}</td>
<td>0.0</td>
<td>0.20 lb/hr</td>
<td>No</td>
</tr>
<tr>
<td>CO</td>
<td>0.0</td>
<td>15 lb/hr</td>
<td>No</td>
</tr>
<tr>
<td>Lead</td>
<td>0.00</td>
<td>14 lb/month</td>
<td>No</td>
</tr>
</tbody>
</table>

Therefore, the installation of the new automotive coating operation does not require criteria pollutant modeling.

As presented previously in the DEQ Automotive Coatings EI Spreadsheet (TRIM record #2011AAG916), and the Potential to Emit section of this Statement of Basis there are no TAPs that required facility modeling for exceeding the pounds per hour screening levels provided in IDAPA 58.01.01.585 and .586. Therefore, the installation of a new automotive coating operation does not require TAP modeling.
REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

Rhino Linings of Canyon County is located in an area which is designated as attainment or unclassifiable for PM$_{2.5}$, SO$_2$, NO$_x$, CO, and Ozone, and non-attainment for PM$_{10}$. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For THAPs (Total Hazardous Air Pollutants) Only:

A = Use when any one HAP has actual or potential emissions $\geq 10$ T/yr or if the aggregate of all HAPS (Total HAPs) has actual or potential emissions $\geq 25$ T/yr.

SM80 = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the permit sets limits $\geq 8$ T/yr of a single HAP or $\geq 20$ T/yr of THAP.

SM = Use if a synthetic minor (potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable limitations) and the potential HAP emissions are limited to $< 8$ T/yr of a single HAP and/or $< 20$ T/yr of THAP.

B = Use when the potential to emit without permit restrictions is below the 10 and 25 T/yr major source threshold

UNK = Class is unknown

For All Other Pollutants:

A = Actual or potential emissions of a pollutant are $\geq 100$ T/yr.

SM80 = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are $\geq 80$ T/yr.

SM = Use if a synthetic minor for the applicable pollutant (potential emissions fall below 100 T/yr if and only if the source complies with federally enforceable limitations) and potential emissions of the pollutant are $< 80$ T/yr.

B = Actual and potential emissions are $< 100$ T/yr without permit restrictions.

UNK = Class is unknown.
<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Uncontrolled PTE (T/yr)</th>
<th>Permitted PTE (T/yr)</th>
<th>Major Source Thresholds (T/yr)</th>
<th>AIRS/AFS Classification</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>6.8</td>
<td>0.13</td>
<td>100</td>
<td>B</td>
</tr>
<tr>
<td>PM$<em>{10}$/PM$</em>{2.5}$</td>
<td>6.8</td>
<td>0.13</td>
<td>100</td>
<td>B</td>
</tr>
<tr>
<td>SO$_2$</td>
<td>-</td>
<td>-</td>
<td>100</td>
<td>-</td>
</tr>
<tr>
<td>NO$_x$</td>
<td>-</td>
<td>-</td>
<td>100</td>
<td>-</td>
</tr>
<tr>
<td>CO</td>
<td>-</td>
<td>-</td>
<td>100</td>
<td>-</td>
</tr>
<tr>
<td>VOC</td>
<td>&lt;100</td>
<td>20</td>
<td>100</td>
<td>B</td>
</tr>
<tr>
<td>HAP (single)</td>
<td>&lt;10</td>
<td>&lt;8</td>
<td>10</td>
<td>B</td>
</tr>
<tr>
<td>HAP (Total)</td>
<td>&lt;25</td>
<td>&lt;20</td>
<td>25</td>
<td>B</td>
</tr>
</tbody>
</table>

**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 automotive coating operation. 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.

The facility has requested DEQ’s general permit for automotive coating operations. In accordance with IDAPA 58.01.01.225 the processing fee is $500.

**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.

**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.

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

IDAPA 58.01.01.301  Requirement to Obtain Tier I Operating Permit

This facility is not subject to Tier I Operating Permit requirements because it is not a major source of air pollution and there are no specific regulations requiring a Tier I Operating Permit for this source category.

**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)

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

DEQ is not delegated this Subpart.

Unless an exemption from the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2), in accordance with 40 CFR 63.11172(a)(2), on and after January 10, 2011 the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH. It appears that the facility will qualify for the EPA exemption because none of the target HAPs are listed in contents of the bed lining materials included in the standard permit analysis (TRIM record #2011AAG916). Target HAP are compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). Regardless, the facility will have to petition EPA to qualify for the exemption.

For the purpose of thoroughness this Subpart is detailed in the following paragraphs as if the facility does not obtain the EPA exemption.

§ 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 §63.11174(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.

§ 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.

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.

§ 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.

Because the facility has not proposed to conduct paint stripping operations, the MeCl minimization plan requirements are not applicable (see permit condition 8).

§ 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.
§ 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.

§ 63.11179  Who implements and enforces this subpart?

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

§ 63.11180  What definitions do I need to know?

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

**Permit Conditions Review**

This section describes the permit conditions for this initial permit.

This permit follows the existing General Permit to Construct for Automotive Coating Operations with the following exceptions:

- The applicant has not specified whether high pressure paint guns will be used and the general permit has been modified to allow the use of high pressure paint guns if the source petitions and receives an exemption form EPA for the requirements of 40 CFR 63, Subpart HHHHHH.
- Traditional automotive painting operations are not allowed. The only coatings allowed to be used are pickup bed liner materials.

Permit conditions 1 & 2 provide a description of the purpose of the permit and the regulated sources, the process, and the control devices used at the facility.

Permit condition 2.1 provides a process description of the facility.

Permit condition 2.2 provides a description of the control devices used at the facility.

Permit condition 2.3 establishes hourly and annual emissions limits for PM$_{10}$ and VOC emissions from the automotive coating operation.

Permit Condition 2.4 establishes a 20% opacity limit for the paint booth stacks, vents, or functionally equivalent openings associated with the automotive coating operation.

Permit Condition 2.5 establishes that the permittee shall not allow, suffer, cause, or permit the emission of odorous gasses, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

Permit condition 2.6 establishes that the facility will not use MeCl to remove paint from vehicles at the facility. This was done because MeCl was not proposed to be used at this facility by the Applicant and the emissions were not included in the DEQ Automotive Coating EI Spreadsheet (see the DEQ website).

Permit condition 2.7 prohibits traditional painting of automobile. The facility is only permitted to apply pickup bed lining material.

Permit condition 2.8 & 2.9 establishes a daily use limit for all coating materials used in the automotive coating process as proposed by the Applicant. This limit was established because it was the easiest way for the Applicant to demonstrate compliance with the PM$_{10}$ and VOC emissions limits and the TAPs emissions limits specified in the DEQ Automotive Coating EI Spreadsheet (TRIM record #2011AAG916 & the PTE Section of this Statement of Basis).
Permit condition 2.10 establishes that the permittee conduct all automotive coating operations in the paint booth or preparation station with the filters in place, exhaust fan(s) operating, and door(s) or curtain(s) closed, that the permittee shall maintain and operate the paint booth station exhaust filter system in accordance with the manufacturer’s specifications. This condition also defines what a booth and preparation station used for applying coating is.

Permit condition 2.11 establishes that the permittee shall maintain records of all odor complaints received, perform appropriate corrective actions, and maintain records of corrective actions taken at the facility for the automotive coating process. This was required because automotive operation operations are expected to have odors that might be offensive to their immediate neighbors.

Permit condition 2.12 establishes that the permittee shall maintain material purchase records and Safety Data Sheets (SDS) for the automotive coating process. This condition was placed in the permit to ensure compliance with the Coating Materials Use Limit Permit Condition.

Permit condition 2.13 establishes that the permittee shall maintain daily usage records of pre-treatment wash primer, primer, topcoat, clear coat, and thinner/reducer materials used for the automotive coating process. This condition was placed in the permit to ensure compliance with the Coating Materials Use Limit permit condition.

Permit condition 2.14 establishes that the permittee shall maintain records as required by the General Provision recordkeeping requirements.

Permit conditions 2.15 through 2.18 establishes parameters that will allow the facility to comply with the requirements of 40 CFR 63, Subpart HHHHHH if an exemption from those requirements is not granted by EPA.

Permit condition 2.19 establishes that the federal requirements of 40 CFR Part 63 are incorporated by reference into the requirements of this permit per current DEQ guidance.

**PUBLIC REVIEW**

**Public Comment Opportunity**

An opportunity for public comment period on the application was provided in accordance with IDAPA 58.01.01.209.01.c or IDAPA 58.01.01.404.01.c. During this time, there were no comments on the application and there was not a request for a public comment period on DEQ’s proposed action. Refer to the chronology for public comment opportunity dates.
APPENDIX A – EMISSIONS INVENTORIES
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*Note: Figures are hypothetical and for demonstration purposes.*
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**Emission Rate (Unit: 24-hr average)**

\[ T = \text{the spray temperature} \]

\[ h = \text{the total hours in hours/year that spray coating is occurring} \]

\[ F = h \times 365 \text{ days/year} = \text{the total hours in hours/year that spray coating is occurring} \]

\[ V = \text{the exhaust rate} \]

\[ V_{\text{exh}} = \text{the exhaust rate at} \] 395° C

\[ \text{L}_{\text{exp}} = \text{the annual emission for spray coating operations} \]

**Formula**

\[ \text{L}_{\text{exp}} = \text{emission rate} \times \text{annual operating hours} \times \text{annual operating days} \]

**Notes**

- Coating: Red Liner "ISO" Component (MDI-Based)
- IDAFP TAPE TLP