



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Curt Fransen, Director

September 7, 2012

Kim Wright
Spunstrand Inc.
602 North Post Street
Post Falls, Idaho 83854

RE: Facility ID No. 079-00038, Spunstrand, Wallace
Final Permit Letter

Dear Ms. Wright:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2012.0050 Project 61096 to Spunstrand located at Wallace for changing a control device from a cyclone to a baghouse. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received July 19, 2012.

This permit is effective immediately and replaces PTC No. P-060132, issued on September 28, 2007. This permit does not release Spunstrand from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

As requested, in accordance with IDAPA 58.01.01.209.05.a, the terms of the PTC will be incorporated into the Tier I permit at the time of renewal.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Air Quality Analyst, at (208) 769-1422 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Dan Pitman at (208) 373-0502 or daniel.pitman@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon". The signature is written in a cursive, flowing style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\DP

Permit No. P-2012.0050 PROJ 61096
Enclosures

Air Quality

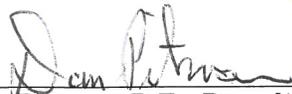
PERMIT TO CONSTRUCT

Permittee Spunstrand Inc.
Permit Number P-2012.0050
Project ID 61096
Facility ID 079-00038
Facility Location 60662 Northside Frontage Road
Wallace, ID 83873

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued September 7, 2012



Dan Pitman, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) to require a baghouse, or equivalent device, instead of a cyclone to control emissions from trimming and cutting operations.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-060132, issued on September 28, 2007.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Cutting and Chopping	Baghouse
2	Fabrication	None

2 Fabrication

2.1 Source Description

Fabrication of fiberglass reinforced duct work, pipes, tubing, and tanks using a filament winding process. The facility consists of three work areas: Main Building, Mark 8 Building, and Warehouse. The Main Building contains three winding machines, a pulling station, a cutting station, and a chopper station. The Mark 8 contains two winding machines and a pulling station. The Warehouse is used for storage and packaging.

2.2 Emissions Control Description

A dust collection baghouse or equivalent device is used to control emissions from the cutting and trimming of products.

[9/7/12]

Limitations

2.3 MACT Limitations, Work Practice Standards & Compliance Deadlines

On and after the compliance date specified in 40 CFR 63.5800 and 40 CFR 63, Subpart WWWW, Table 2, the permittee shall comply with the applicable compliance deadlines, emission limitations, operating limitations and work practice standards of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. Please refer to the following sections of the rule

- Compliance Deadline: 40 CFR 63.5800; 40 CFR 63 Subpart WWWW, Table 2
- Emission Limitations: 40 CFR 63.5805(b); 40 CFR 63 Subpart WWWW, Table 3
- Work Practice Standards: 40 CFR 63.5805(b); 40 CFR 63 Subpart WWWW, Table 4

2.4 PM₁₀ Emission Limits

Emissions of PM₁₀ from the dust collection baghouse or equivalent device shall not exceed any corresponding emission limit listed in Table 2.1.

Table 2.1 EMISSIONS LIMITS

Pollutant	PM ₁₀
	lb/day
Dust Collection Baghouse	14.4

[9/7/12]

2.5 Opacity Limit

Emissions from the dust collection baghouse stack, or any other stack, vent, or functionally equivalent opening associated with the coating application process, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.6 Odorous Emissions

In accordance with IDAPA 58.01.01.776, odorous gases shall not be emitted to the atmosphere in such quantities as to cause air pollution.

Compliance Demonstration Requirements

2.7 MACT Compliance Demonstration Requirements

On and after the compliance date specified in 40 CFR 63.5800 and 40 CFR 63, Subpart WWWW, Table 2, the permittee shall comply with the applicable compliance demonstration requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. Please refer to the following sections of the rule

- Options For Meeting The Standards For Open Molding And Centrifugal Casting Operations At New And Existing Sources: 40 CFR 63.5810.
- General Compliance Requirements: 40 CFR 63.5835.
- Performance Test Or Other Initial Compliance Demonstration: 40 CFR 63.5840, 40 CFR 63.5860.
- Continuous Compliance Demonstration: 40 CFR 63.5895, 40 CFR 63.5900
- Recordkeeping: 40 CFR 63.5905, 40 CFR 63.5910, 40 CFR 63.5915, 40 CFR 63.5920.

2.8 Dust Collection Baghouse/Control Device

- The permittee shall not trim and/or cut products unless the dust collection baghouse or equivalent control device with a manufacturer guaranteed PM₁₀ control efficiency of 90% or greater is in operation.

[9/7/12]

- Baghouse/Control Device Procedures

Within 60 days of initial start-up, the permittee shall have developed a Baghouse or Equivalent Control Device Procedures document for the inspection and operation of the control device. The Baghouse or Equivalent Control Device Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse or Equivalent Control Device Procedures document shall describe the procedures that will be followed to comply with the General Provision requirement to maintain the baghouse or equivalent control device in good working order and operate it as efficiently as practicable, and shall contain requirements for weekly see-no-see visible emissions inspections of the control device. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse or Equivalent Control Device Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse or equivalent control device at anytime. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The Permittee shall maintain records of the results of each control device inspections in accordance with the General Provisions. The records shall include , but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, auger, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse or Equivalent Control Device Procedures document shall be submitted to DEQ within 60 days of permit issuance and shall contain a certification by a responsible official. Any changes to the procedures document shall be submitted within 15 days of the change.

The procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating, monitoring and recordkeeping requirements specified in the procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[9/7/12]

2.9 Odor Management Plan

Within 60 days of issuance of this permit, the permittee shall have developed an Odor Management Plan for the facility. The plan shall describe procedures that will be followed to comply with Permit Condition 2.6. The plan shall include, but not be limited to, the following provisions:

- Maintain negative air pressure inside the buildings.
- Keep all storage containers and vessels closed when not in use.

Notification and Reporting Requirements

2.10 MACT Notifications And Reporting Requirements

On and after the compliance date specified in 40 CFR 63.5800 and 40 CFR 63, Subpart WWWW, Table 2, the permittee shall comply with the applicable notification and reporting requirements of the National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW. Please refer to the following sections of the rule:

- Notifications: 40 CFR 63.5905; 40 CFR 63, Table 13
- Initial Compliance Report: 40 CFR 63.5910.
- Semiannual Report: 40 CFR 63.5910.

2.11 Certification of Documents

All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications shall be submitted in accordance with General Provision 9.

3 General Provisions

General Compliance

- 3.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the “Rules for the Control of Air Pollution in Idaho.” The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the “Rules for the Control of Air Pollution in Idaho,” and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)
[Idaho Code §39-101, et seq.]
- 3.2 The permittee shall at all times (except as provided in the “Rules for the Control of Air Pollution in Idaho”) maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
[IDAPA 58.01.01.211, 5/1/94]
- 3.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.
[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

- 3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
 - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108]

Construction and Operation Notification

- 3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.
[IDAPA 58.01.01.211.02, 5/1/94]
- 3.6 The permittee shall furnish DEQ written notifications as follows:
- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 3.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 3.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 3.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

- 3.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 3.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

- 3.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

- 3.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

- 3.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

- 3.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]