



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, ID 83706 • (208) 373-0502
www.deq.idaho.gov

Brad Little, Governor
John Tippetts, Director

April 15, 2020

Mike Westbrook, Plant Manager
Frazier Industrial Company
2255 West 49th South
Idaho Falls, Idaho 83402

RE: Facility ID No. 019-00086 Frazier Industrial Co. – Idaho Falls, Idaho Falls
Final Permit Letter

Dear Mr. Westbrook:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2011.0114 project 62378 to Frazier Industrial Co. – Idaho Falls located at Idaho Falls for revising coating usage limit. 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 January 30, 2020.

This permit is effective immediately and replaces PTC No. P-2011.0114, issued on August 25, 2016. This permit does not release Frazier Industrial Co. – Idaho Falls from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with Rensay Owen, Regional Air Quality Manager, at (208) 528-2650 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 Shawnee Chen at (208) 373-0502 or Shawnee.chen@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".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\syc

Permit No. P-2011.0114 PROJ 62378

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Frazier Industrial Co. – Idaho Falls
Permit Number P-2011.0114
Project ID 62378
Facility ID 019-00086
Facility Location 2255 West 49th South
Idaho Falls, Idaho 83402

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

April 15, 2020



Shawnee Chen, 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 change how paints and solvent usages are limited, to add a portable dip tank, and to revise the emissions limit for volatile organic compounds (VOC). [4/15/2020]
- 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 PTC No. P-2011.0114 Project 61537, issued on August 25, 2016. [4/15/2020]

Regulated Sources

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

Table 1.1 REGULATED SOURCES

Source Descriptions	Emission Controls
<u>Dip Tank 1:</u> Manufacturer: internally fabricated Tank Capacity: 3,636 gallon <u>Dip Tank 2:</u> Manufacturer: internally fabricated Tank Capacity: 1,793 gallon <u>Dip Tank 3:</u> Manufacturer: internally fabricated Tank Capacity: 8,311 gallon <u>Portable Dip Tank</u> Manufacturer: internally fabricated Tank Capacity: 660 gallon Total Paint Usage Limit: 38,000 gallons for all dip tanks Total Solvent Usage Limit: 9,300 gallons for all dip tanks	None
<u>Paint and solvent storage</u> For Paint Storage: 330-gallon totes or equivalent fully-enclosed storage containers For Solvent Storage: 55-gallon drums or equivalent fully-enclosed storage containers	None
<u>Steel Welding</u> Material Usage Limit/Maximum Projected Usage: 200,000 lb/yr wire or welding electrode (S07)	None

[4/15/2020]

2. Structural Steel Storage Systems Manufacturing

2.1 Process Description

Frazier Industrial Company – Idaho Falls (Frazier) manufactures structural steel storage systems. Steel is delivered to the facility and is then cut and welded into product components. The type of welding conducted at the facility is gas metal arc welding or metal inert gas welding. The welded steel components are then bundled and prepared to be coated with paint.

The steel components are coated using a dip tank paint system consisting of three large rectangular steel tanks and one small portable dip tank used to contain the paint. Each dip tank system is internally fabricated. The dip tank system is capable of keeping the paint mixed, filtered, and within a predetermined temperature.

Solvent is stored in 55-gallon drums. The solvent is added to the dip tanks to obtain the desired paint viscosity. The solvent is also occasionally used to clean paint from rollers, scrapers and other tools used in the painting operation. The solvent that is used for cleaning is recycled back into the process by being mixed in the dip tanks when needed. Paint is stored in metal mobile totes prior to being placed in the dip tanks. The dip tanks are open when steel is being dipped and are closed when not in use. The facility utilizes a wall exhaust fan to provide building ventilation. The exhaust fan does not control emissions from the building.

Steel components are typically dipped and kept in the dip tank for a minimum of two minutes. Once the steel components are coated, they are hoisted out of the tank and allowed to drain for approximately 25 minutes. Next, a nap paint roller is used to smooth out any excess paint and coat unpainted surfaces. The painted steel components are then sent to the storage area where the finished product is stored until it is shipped to the customer.

[4/15/2020]

2.2 Emission Controls Description

The facility utilizes wall exhaust fans to provide building ventilation. The exhaust fans do not control emissions from the building. Emissions from the dip coating tanks, the paint and solvent storage, and welding are uncontrolled.

Table 2.1 EMISSIONS UNIT DESCRIPTION

Emissions Units / Processes	Emission Control Devices	Emission Points
<p><u>Dip Tank 1:</u> Manufacturer: Internally fabricated Tank Capacity: 3,636 gallon</p> <p><u>Dip Tank 2:</u> Manufacturer: Internally fabricated Tank Capacity: 1,793 gallon</p> <p><u>Dip Tank 3:</u> Manufacturer: Internally fabricated Tank Capacity: 8,311 gallon</p> <p><u>Portable Dip Tank</u> Tank Capacity: 660 gallon Total Paint Usage Limit: 38,000 gallons for all dip tanks Total Solvent Usage Limit: 9,300 gallons for all dip tanks</p>	None	<p><u>The Stack</u></p> <p>Exit Height: 39 ft (12 m) Exit Diameter: 2 ft (0.6 m) Exit Flow rate: 8,230 acfm Exit Temperature: ambient temperature</p>
<p><u>Paint and solvent storage</u> For Paint Storage: 330-gallon totes or equivalent fully-enclosed storage containers For Solvent Storage: 55-gallon drums or equivalent fully-enclosed storage containers</p>	None	NA
<p><u>Steel Welding</u></p> <p>Material Usage Limit/Maximum Projected Usage: 200,000 lb/yr wire or welding electrode (S07)</p>	None	<p>Total 20 vents</p> <p><u>Five vents with the following exhaust parameters</u></p> <p>Exit Height: 29 ft (8.8 m) Exit Diameter: 3 ft (0.9 m) Exit Flow rate: 4,840 acfm Exit Temperature: ambient temperature</p> <p><u>Five vents with the following exhaust parameters</u></p> <p>Exit Height: 33 ft (10 m) Exit Diameter: 3 ft (0.9 m) Exit Flow rate: 4,840 acfm Exit Temperature: ambient temperature</p> <p><u>Five vents with the following exhaust parameters</u></p> <p>Exit Height: 30 ft (9.1 m) Exit Diameter: 3 ft (0.9 m) Exit Flow rate: 4,840 acfm Exit Temperature: ambient temperature</p> <p><u>Five vents with the following exhaust parameters</u></p> <p>Exit Height: 27 ft (8.2 m) Exit Diameter: 3 ft (0.9 m) Exit Flow rate: 4,840 acfm Exit Temperature: ambient temperature</p>

[4/15/2020]

Emission Limits

2.3 Emission Limits

The VOC emissions from the entire plant, including but not limited to coating operations, shall not exceed 98.6 tons per any consecutive 12-calendar month period.

In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.

[4/15/2020]

2.4 Opacity Limit

Emissions from each stack, or any other stack, vent, or functionally equivalent opening associated with the structural steel storage systems manufacturing 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.

Operating Requirements

2.5 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.6 Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

2.7 Welding Operation

The permittee shall use gas metal arc welding or metal inert gas welding and operate all equipment associated with welding operations according to manufacturer's instructions.

[8/25/2016]

2.8 Throughput Limits

The material usage rates shall not exceed the values listed in Table 2.2.

Table 2.2 FACILITY-WIDE COATING AND WELDING MATERIAL USAGE LIMITS

Coating Material	Material Usage Rate (gal/yr) ^(a)
Paint	38,000
Solvent	9,300
Wire or Welding Electrode	200,000 lb/yr

^(a) Gallons per consecutive 12-calendar month period

[4/15/2020]

2.9 Coating Material Formulation Limits

Unless the permittee meets the requirements in Coating Formulation Change permit condition, the content of volatile organic compounds (VOC) in any coating material, the content of a toxic air pollutant (TAP) in any coating material, and the total hazardous air pollutants (HAP) content calculated according to this permit condition shall not exceed any corresponding limit listed in Table 2.3.

The content of a TAP in lb/gal in a coating material can be calculated by multiplying the coating material density in lb/gal to the maximum weight fraction of the TAP.

The VOC content in lb/gal in a coating material can be found in each safety data sheet (SDS), or can be calculated by multiplying the coating material density in lb/gal to the maximum weight fraction of VOC.

The total HAP content in lb/gal is the sum of each individual HAP content in lb/gal in every coating material (i.e., paint and solvent). Each individual HAP content in a coating material in lb/gal can be calculated by multiplying the coating material density in lb/gal to the maximum weight fraction of the HAP.

Table 2.3 COATING MATERIAL VOC, TOTAL HAP, AND TAP MAXIMUM CONTENT

TAP, VOC, or HAP	Paint (lb/gal)	Solvent (lb/gal)
n-Butyl Alcohol	0.525	0
Xylene	0.195	0.365
Ethyl Benzene	0.053	0
Stoddard	0	0
Cumene	0	0.365
Trimethyl Benzene	1.575	3.650
VOC	3.4	7.30
Total HAP	0.25	0.73

[4/15/2020]

2.10 Coating Formulation Change

Prior to changing formulation of any permitted coating material as listed in Table 2.3, if the new formulation has higher VOC, TAP, or total HAP content than what is listed in Table 2.3, or contains a new TAP or HAP that is not included in Table 2.3, the permittee shall conduct a PTC applicability determination and submit a PTC application if it is applicable in accordance with IDAPA 58.01.01.200.

The permittee shall notify DEQ for any coating formulation change with higher VOC, total TAP, or HAP content than what is listed in Table 2.3, or with a new TAP or HAP that is not included in Table 2.3 and submit a revised emissions inventory for the change prior to changing formulation of any permitted coating material as listed in Table 2.3. The documentation shall be kept on site and made available to DEQ's representative upon request.

[4/15/2020]

Monitoring and Recordkeeping Requirements

2.11 Throughput Monitoring

Every month, the permittee shall monitor and record the following information. Annual usage shall be calculated as a rolling 12-calendar month by summing the current month material usage to the previous consecutive 11-month material usage.

For each coating material

- The name and material usage of each coating material, in gallons per month.

- The material usage of each coating material, in gallons per consecutive 12-calendar month.

For the welding wire

- The name, type, and welding wire usage, in pounds per month.
- The welding wire usage in pounds per consecutive 12-calendar month.

2.12 Coating Material Formulation Monitoring

For each coating material used, the permittee shall maintain purchase records and information provided by materials suppliers or manufacturers, such as SDS (formerly called MSDS), or manufacturer's formulation data. The information shall include, but not be limited to:

- The manufacturer name and product number.
- The weight fractions of each TAP, in percent by weight.
- The weight fractions of each HAP, in percent by weight.
- The weight fraction of VOC, in percent by weight.
- The density, in pounds per gallon.

2.13 VOC Emissions Monitoring

Every month, the permittee shall monitor and record the annual VOC emissions to demonstrate compliance with the VOC emissions limit.

The permittee shall calculate monthly VOC emissions using monthly throughput information and coating material formulation information recorded in Permit Conditions 2.11 and 2.12.

Annual VOC emissions shall be calculated as a rolling 12-calendar month by summing the current month VOC emissions to the previous consecutive 11-month VOC emissions.

Reporting Requirements

2.14 Any reporting and notification required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Idaho Falls Regional Office
Department of Environmental Quality
900 N. Skyline, Suite B
Idaho Falls, ID 83402

Phone: (208) 528-2650
Fax: (208) 528-2695

[8/25/2016]

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 and 4/11/15]

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]