

Statement of Basis

Tier I Operating Permit No. T1-2017.0058

Project ID 61962

Best Bath Systems, Inc. - Caldwell

Caldwell, Idaho

Facility ID 027-00103

Final

May 7, 2018

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Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

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1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

BBS	Best Bath Systems, Inc. - Caldwell
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
HAP	hazardous air pollutants
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/hr	pounds per hour
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O ₂	oxygen
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
SIP	State Implementation Plan
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T1	Tier I operating permit
T2	Tier II operating permit
TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compounds

2. INTRODUCTION AND APPLICABILITY

Best Bath Systems, Inc. - Caldwell (BBS) is a manufacturer of fiberglass tubs and showers and is located at 723 Garber Street, Caldwell, Idaho 83605. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008, because it emits or has the potential to emit volatile organic compounds (VOC) above the major source threshold of 100 tons-per-year and because it emits or has the potential to emit styrene above the major source thresholds of 10 tons-per-year for any single HAP and/or 25 tons-per-year for any combination of HAP.

As a major facility, BBS is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from BBS as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I Operating Permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for BBS.

The format of this Statement of Basis follows that of the permit. BBS's Tier I operating permit is organized into sections. They are as follows:

Section 1 – Acronyms, Units, and Chemical Nomenclature

The acronyms, units, and chemical nomenclature used in the permit are defined in this section.

Section 2 – Permit Scope

The scope describes this permitting action.

Section 3 – Facility-Wide Conditions

The Facility-Wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

Sections 4 – Production of Bath Units (Stacks EF-9, EF-10, EF-11, EF-12, and EF-14)

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

Section 5 - Insignificant Activities

This section lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

Section 6 - General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

3. FACILITY INFORMATION

3.1 Facility Description

BBS is a fiberglass tub and shower manufacturing facility. Production activities and processes are described below.

EU7 – Resin Storage Room

Fiberglass resin is stored in two 5500-gallon capacity tanks in the Resin Storage Room (EU7), located in the southwest corner of the building. The tanks sit inside secondary containment. The room is equipped with a roof-mounted ventilation fan. This centrifugal, up-blast exhaust fan (stack EF7), discharges vertically.

The resin tanks are refilled via a supply truck. The resin is composed of styrene and unsaturated polyester polymer in a 35/65 wt% mix. Maximum daily styrene emissions from the room will occur when the tanks are refilled and styrene-saturated air is displaced from the tanks.

To prepare the resin for production, it is pumped from a bulk tank to a day tank where calcium sulfate is then introduced via a hopper/auger. The solution is then covered and shear mixed. Now ready for production, the filled resin is continuously circulated in a closed system feeding the lamination area of the production floor.

Also stored in the resin storage room are 55-gallon drums of polyester gelcoat and barrier coat. These materials are production ready and day use quantities are taken to the production floor when necessary.

EU8 – Maintenance Room

The Maintenance Shop is used for miscellaneous equipment fabrication and repair. Maintenance Shop activities periodically require incidental welding. The exhaust fan in the Maintenance Shop is used to exhaust welding fumes, but is primarily used to provide airflow for worker comfort. Makeup air to the Maintenance Shop is drawn in from outside, not from the production area.

EU9 – Lamination Area

BBS produces polymer composite shower and tub units primarily using spray layup techniques on open molds. BBS also produces non-bathware composite parts such as RV components exterior architectural panels. Typically, three polyester-styrene layers are applied to molds to create the bathware units: gel coat, barrier coat, and glass-reinforced resin. All three layers are sprayed onto a part. A fourth polymeric diisocyanate material, “blue foam,” is sprayed on to create reinforced floors. The first three layers are applied in the Lamination Area. Other components such as RV parts are made in a similar fashion minus the blue foam reinforcement.

Architectural panels are made with a proprietary blend of filled gelcoat. It is also reinforced with a resin glass matrix. The reinforcement material may be applied in one of two ways. It is either sprayed in the same fashion as other products, or a glass-woven roving mat will be saturated in a resin bath ensuring proper saturation ratios and limiting spray emissions. The production part may also be closed-molded with a vacuum bag that also reduces emissions.

Additional Process Description

BBS employs an “open-plan” production floor in the Lamination Area. The open-plan system improves efficiencies as the units are moved through the production cycle. Molds on wheeled carts are brought into the Lamination Area from Mold Storage. The first material, gel coat, is applied to the molds using atomizing, manual spray guns. The molds are then moved east to the next station where a second layer, barrier coat, is applied using atomizing, manual spray guns. The molds are then moved clockwise through two more stations where two layers of resin and chopped glass strand are applied using non-atomizing, manual spray guns. The surface is compressed to remove any trapped air. The resin is given time to cure, after which the units are removed from the molds before being moved into the next production area.

After the part is cured, it is removed from the mold and then enters a contained room for trimming and grinding to construction specifications. The trim room has two plenums to filter and recirculate the air.

Some showers may require blue foam reinforcement. The part is then moved to the blue foam application area where the foam is applied and using hydraulic presses the unit and foam is leveled.

At this point production is now complete and parts go through a quality check. Some units may require assembly and then they are packaged and prepared for shipment.

The open plan floor eliminates the traditional spray booths for the different sprayed layers. Instead, air exhaust and emission control are handled differently. Two long, cylindrical horizontal ducts are suspended above the production floor along the north and south Room 2 walls. Seventeen intakes are spaced along the horizontal ducts. These intakes are 50" by 12" rectangular ducts that descend to the shop floor. Approximately 1 foot above the floor, each intake has a 24" by 24" opening fitted with particulate control filters. Emissions from the Lamination Area stations are drawn via two exhaust fans into and up the intakes, through the horizontal ducts, and discharged outside, vertically, above the roof (stacks EF9 and EF10).

Fresh air to the Lamination Area is provided by a direct-fired, natural gas Makeup Air Unit (MAU1). The Lamination Area is designed to operate under negative pressure.

The atomizing spray gun used for the gel and barrier coat application is a Magnum Venus ITD-3500 gel gun. The non-atomizing spray gun used for the resin application is a Magnum Venus TLN-IC-200-INT.

The seventeen 24" x 24" exhaust air filter units (EC9A to EC9G and EC10A to EC10J), are equipped with two Purolator fiberglass panel filters installed in series: FACET-Aire F312 with an average arrestance of 72 wt% and Purolator Bulk Media with an average arrestance of 84 wt%. The calculated overall arrestance of the two filters in series is:

$$\text{Overall Arrestance, \%} = 100\% - 100\% * (1 - 0.72) * (1 - 0.84) = 95.5 \text{ wt\%}$$

However, because of the lack of test data documentation for the bulk media, for this permit analysis 90% filter efficiency was used.

EU11 – Trim/Finish Area

Activities at the Trim/Finish Area include finishing raw edges, installing plumbing holes, spraying reinforced flooring and touching-up small flaws on the tub and shower units.

At the Blue Bottom Area rigid floor foam is manually sprayed under the base of some units. At the Finish Area, inspection and any required touch-up work occur. Assembly/Packaging includes attaching fixtures and crating for shipment.

Fresh air for the Trim/Finish Area is provided by a direct-fired, natural gas Makeup Air Unit, MAU2. Emissions from the Blue Bottom Area stations are drawn via two exhaust fans (EF11 and EF12), located on the roof directly above the Blue Bottom Area. Intake plenums equipped with particulate filters, EC11 and EC12, descend to the shop floor adjacent to the Blue Bottom spray area.

The Trim Room corridors (approximately 15 feet tall) are also equipped with particulate emission control equipment (ECT1 and ECT2). Trim Room fans (RF1 and RF2), draw air from the trimming area through particulate filters. The Trim Room fans discharge the filtered air back into the Trim/Finish Area, not to the outside.

The particulate filters used in the Trim Room corridors and Blue Bottom Area stations are the same as those used in the Lamination Area: FACET-Aire F312 and Purolator Bulk Media. An overall arrestance of 90% is used in the emission estimation calculations for the Trim/Finish Area (from EF11 and EF12).

Since the Trim Room fans discharge back into the Trim/Finish Area, particulate not captured by the Trim Room filters could be discharged outside via exhaust fans (EF11 or EF12). To estimate the facility particulate emissions from the Trim Room operations, 80% capture and control efficiency was estimated for the Trim Rooms circulating air treatment system.

EU15/EU16/EU17 – Unit Heaters

There are eleven gas-fired unit heaters installed throughout the facility. These units typically have an input design duty of 300,000 Btu/hr. The combustion gases from these units are vented via 8” ducts directly up through the roof.

Because the potential emissions from each of these small units are not large, and because they are clustered together in certain rooms around the facility, groups of heaters are collocated into three composite point sources for emission estimating. EU15 is a composite of five unit heaters located in the Mold Storage Area. EU16 is a composite of four unit heaters located in the Assembly/Packaging Area. EU17 is a composite of two unit heaters located in and just outside the Maintenance Room.

MAU – Make Up Air Unit 1

Fresh air to the Lamination Area is provided by a makeup air unit (MAU1), located just outside the west wall of the building. For cold weather operations, MAU1 includes a direct-fired, natural gas-fueled air heater with a design input duty of 8.565 MMBtu/hr. A Hastings Model SBD 233 make up air unit has been specified for this service. The unit is direct-fired and the combustion gas is emitted via the Lamination Area exhaust fans (EF9 and EF10).

MAU2 – Make Up Air Unit 2

Fresh air to the Trim/Finish Area is provided by a makeup air unit (MAU2), located just outside the west wall of the building. For cold weather operations, MAU2 includes a direct-fired, natural gas fueled air heater with a design input duty of 1.00 MMBtu/hr. A Hastings Model SBD 215 make up air unit has been specified for this service. The unit is direct-fired and the combustion gas is emitted via the Blue Bottom Area exhaust fans (EF11 and EF12).

Spray Paint Booth

The Accent Booth is used to apply trim color to certain tub and shower units. Automotive paint is applied with a manual spray gun. Accent painting is not done on every tub and shower unit. Therefore the paint booth is assumed to typically operate 2-3 days per week.

The booth is equipped with an exhaust fan (EF14), which draws booth air through overspray filters and discharges through a roof stack. BBS will use overspray air filters and pre-filters with a minimum combined capture efficiency of 90%. The Accent Booth exhaust fan is a Greenheck Model TAB-30-030T3, operating at 12,600 CFM.

The Accent Booth roof stack is 30” in diameter and releases vertically. A flapper on the outlet will open fully when the exhaust fan is operating. Wet coatings are currently applied using a Graco Sharpe Finex FX3000 manual spray gun. The gun is classified HVLP with typical retention efficiencies commonly cited as greater than 65%. Since the 25% retention efficiency for conventional air atomizing spray gun was used in the emission estimation calculations for the prior spray gun, the current HVLP spray gun performs better, exceeds the efficiency used in the emission calculations. All wet coating particulate emissions are conservatively assumed to be PM₁₀. All volatile wet coating components are assumed to be completely emitted.

3.2 Facility Permitting History

Tier I Operating Permit History - Previous 5-year permit term May 23, 2013 to May 7, 2018

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from May 23, 2013 to May 7, 2018. This 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).

May 22, 2013	T1-2012.0067 Project 61131, initial Tier I permit, Permit status (A, will become S upon issuance of this permit)
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Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This 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).

June 22, 2010 P-2010.0047, Initial permit to construct (PTC), Permit status (A)

4. APPLICATION SCOPE AND CHRONOLOGY

4.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit.

4.2 Application Chronology

November 21, 2017	DEQ received an application.
December 1, 2017	DEQ made available the draft permit and statement of basis for peer and regional office review.
December 20, 2017	DEQ determined that the application was incomplete.
December 20, 2017	DEQ made available the draft permit and statement of basis for applicant review.
January 17, 2018	DEQ received supplemental information from the applicant.
February 13, 2018	DEQ determined that the application was complete.
February 13 – March 15, 2018	DEQ provided a public comment period on the proposed action.
March 19, 2018	DEQ provided the proposed permit and statement of basis for EPA review.
May 7, 2018	DEQ issued the final permit and statement of basis.

5. EMISSIONS UNITS, PROCESS DESCRIPTIONS, AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

5.1 Process No. 1 – Production of Bath Units

Table 5.1 lists the emissions units and control devices associated with the production of bath units.

Table 5.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device	Emission Point ID No.
Coatings applications during fabrication of fiberglass reinforced plastics	For PM/PM ₁₀ /PM _{2.5} control: 1-inch fiberglass filter (approximately 72% efficiency); and fiberglass bulk media filter (approximately 84% efficiency)	EF-9, EF-10, EF-11, and EF-12
Accent application in a paint booth	For VOC and HAP control: Control of operations in accordance with NESHAP/MACT requirements	EF-14
Trim and finish operations. Rough edges are trimmed and plumbing holes are drilled. Exhaust from this area is filtered and exhausted back into the Trim Room work area. It is not directly vented to the outside.	For PM/PM ₁₀ /PM _{2.5} control: High-efficiency cartridge filters with a minimum efficiency of 90%.	---
Combustion emissions from a makeup air unit with an input rating of approximately 8.6 MMBtu/hr. Emissions from this direct-fired natural gas fueled unit are vented thru the fiberglass production area exhaust stacks.	Use of natural gas fuel and good combustion control	EF-9, EF-10, EF-11, and EF-12

BBS produces fiberglass shower and tub units primarily using spray layup techniques on open molds. Typically, three polyester-styrene layers are applied to molds to create the units: gel coat, barrier coat, and glass-reinforced resin. A fourth polymeric diisocyanate material, “blue foam,” is sprayed on to create reinforced floors. The first three layers are applied in the Lamination Area. Accents may be applied in a paint booth (EF-14).

The air ventilation system for production operations exhausts through a series of two filters to stacks. The exhaust from the air ventilation system first passes through a fiberglass bulk media filter and then through a 1-inch fiberglass filter. Emissions from the makeup air units are co-mingled with the production area emissions, and exit the building through the production area stacks.

5.2 Insignificant Emissions Units Based on Size or Production Rate

This section contains a list of units or activities that are insignificant on the basis of size or production rate. Units and activities listed in this section must be listed in the permit application. Table 5.2 lists the units and activities which have been determined to be insignificant on the basis of size or production rate. The regulatory authority for emissions units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

Table 5.2 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit / Activity	Regulatory Authority / Justification
11 natural gas-fired unit heaters less than 5,000,000 Btu/hr	58.01.01.317(b)(5)
Make up air unit #2 less than 5,000,000 Btu/hr fired on natural gas	58.01.01.317(b)(5)

As requested by the applicant, the 11 unit heaters and MAU-2 which qualify as insignificant activities were excluded from the list of regulated sources (Permit Condition 2.4).

5.3 Emissions Inventory

Table 5.3 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is 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 hour 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 emission is state or federally enforceable. The documentation provided by the applicant for the emissions inventory and emission factors is provided in Appendix A - Emission Inventories.

Table 5.3 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)

Source Description	PM _{2.5} T/yr	PM ₁₀ T/yr	NO _x T/yr	SO ₂ T/yr	CO T/yr	VOC T/yr	Lead T/yr	Styrene HAP T/yr	HAP T/yr
Lamination Area South, MAU1 – EF9	2.05	2.05	1.84	0.01	1.54	108.2	0.000	95.9	98.3
Lamination Area North, MAU1 – EF10	2.05	2.05	1.84	0.01	1.54		0.000		
Blue Bottom Area North, MAU2 – EF11	0.38	0.38					0.000		
Blue Bottom Area South, MAU2 – EF12	0.38	0.38					0.000		
Accent Booth – EF14	0.02	0.02					0.000	0.0	0.08
All Natural Gas Combustion Sources	0.42	0.42	5.52	0.033	4.64	0.30	0.005	0.0	0.11
Total Emissions	5.30	5.30	9.20	0.05	7.72	108.5	0.005	95.9	98.5

6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Production of Bath Units Emission Limits;
- General Provisions.

MRRR

Monitoring, recordkeeping and reporting requirements (MRRR) are the means with which compliance with an applicable requirement is demonstrated. In this section, the applicable requirement (permit condition) is provided first followed by the MRRR. Should an applicable requirement not include sufficient MRRR to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit (i.e. gap filling). In addition to the specific MRRR provided for each applicable requirement, generally applicable facility-wide conditions and general provisions may also be provided, such as performance testing, reporting, and certification requirements.

The legal and factual basis for each permit condition is provided for in this document. If a permit condition was changed due to facility draft comments or public comments, an explanation of the changes is provided. Because the initial MACT notification requirement was satisfied (refer to Appendix D – Copy of Initial MACT Notification), this requirement was removed from the permit (Permit Condition 4.17 of T1-2012.0067 Project 61131).

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a “State-only” requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as “State-only,” all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

6.2 Facility-Wide Conditions

Permit Condition 3.2 - Fugitive Dust

All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651.

In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

[IDAPA 58.01.01.650-651, 3/30/07]

MRRR (Permit Conditions 3.3 through 3.5)

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct facility-wide inspections of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

Permit Condition 3.6 - 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.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

MRRR (Permit Condition 3.7)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State only), 5/1/94]

Permit Condition 3.8 - Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

MRRR (Permit Condition 3.9 through 3.10)

- Conduct facility-wide inspections of all emissions units subject to the visible emissions standards (or rely on continuous opacity monitoring);
- If visible emissions are observed, take appropriate corrective action and/or perform a Method 9 opacity test;
- Maintain records of the results of each visible emissions inspection.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Permit Conditions 3.11 through 3.15 - Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the excess emissions facility wide conditions and the regulations of IDAPA 58.01.01.130-136.

MRRR (Permit Conditions 3.11 through 3.15)

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory;
- Notify DEQ of each excess emissions event as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ;
- Maintain records of each excess emissions event.

Permit Condition 3.16 - Open Burning

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 5/08/09]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.17 - Asbestos

The permittee shall comply with all applicable requirements of 40 CFR 61, Subpart M—“National Emission Standard for Asbestos.”

[40 CFR 61, Subpart M]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.18 - Accidental Release Prevention

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance is present above a threshold quantity is first listed under 40 CFR 68.130.
 - The date on which a regulated substance is first present above a threshold quantity in a process.
- [40 CFR 68.10 (a)]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.19 - Recycling and Emissions Reductions

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.20 - NESHAP General Provisions

This facility is subject to NESHAP Subpart WWWW, and is therefore required to comply with applicable General Provisions.

[40 CFR 60, Subpart A]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.21 - Monitoring and Recordkeeping

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information 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 58.01.01.322.06, 07, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Conditions 3.22 through 3.25 - Performance Testing

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All 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, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

MRRR (Permit Conditions 3.24 and 3.25)

The permittee shall submit compliance test reports to DEQ following testing.

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Permit Condition 3.26 - Reports and Certifications

This permit condition establishes generally applicable MRRR for submittal of reports, certifications, and notifications to DEQ and/or EPA as specified.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.27 - Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein.

[IDAPA 58.01.01.107, 4/7/11]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

6.3 Emissions Unit-Specific Emissions Limits and MRR

Production of Bath Units (Stacks EF-9, EF-10, EF-11, EF-12, and EF-14)

As provided in the initial T1 permitting action, the particulate matter performance test (Permit Condition 17 of P-2010.0047), the operations & maintenance manual and odor manual plan initial submittal requirement (Permit Condition 20 of P-2010.0047), and the T1 permit application requirement (Permit

Condition 21 of P-2010.0047) were not incorporated into this permit, because these conditions were previously satisfied (performance test completed 9/12/2012).

The MACT Compliance Deadline (Permit Condition 6 of P-2010.0047 and 4.2 of T1-2012.0067 Project 61131) was not incorporated into this renewal, because the initial compliance deadline has passed. Reasonable control of fugitive emissions (Permit Condition 8 of P-2010.0047 and 4.6 and 4.20 of T1-2012.0067 Project 61131), visible emissions monitoring (Permit Condition 18 of P-2010.0047 and 4.19 of T1-2012.0067 Project 61131), and the odorous emissions limit (Permit Condition 9 of P-2010.0047 and 4.7 of T1-2012.0067 Project 61131) have been consolidated under the respective facility-wide conditions (Permit Conditions 3.2, 3.5, 3.6, 3.7, 3.9, and 3.10).

Permit Condition 4.1, Bath Units Emission Limits

Total emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) from Stacks EF-9, EF-10, EF-11, and EF-12 shall not exceed any corresponding emission limit listed in Table 4.3. Total emissions of volatile organic compounds (VOC) from Stacks EF-9, EF-10, EF-11, and EF-12 shall not exceed any corresponding emission limit listed in Table 4.3.

Three years from the date of notification of exceedance of the HAP emission threshold specified in 40 CFR 63.5805(c), the total VOC emission limit specified in Table 4.3 of this permit shall not apply, and the permittee shall comply with the emission limits specified in 40 CFR 63.5805(d).

Table 4.3. Lamination area and blue bottom area emission limits ^(a)

Pollutant	lb/hr ^(c)	T/yr ^(d)
PM ₁₀ ^(b)	1.60	--
Total VOCs	--	108

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d) Tons per any consecutive 12-calendar month period.

MRRR - (Permit Conditions 4.6, 4.12 through 4.14)

This facility is required to comply with the emissions standards for PM₁₀ and VOCs. The PM₁₀ emission limit is demonstrated through compliance with the spray gun and filter specifications and the dust collection system. Compliance has already been demonstrated with a performance test. The VOC emission limit is demonstrated through the material usage records and the VOC emissions determination equation.

Permit Conditions 4.2 – 4.3, MACT Limitations and Work Practice Standards

Permit Conditions 4.2 through 4.4 of the permit incorporate the requirements of 40 CFR 63 Subpart WWWW. Should there be a conflict between Subpart WWWW and the permit, Subpart WWWW shall govern including any amendments to the regulation.

MRRR - (Permit Conditions 4.7 – 4.11 and 4.16 – 4.27)

Monitoring, recordkeeping, testing, and reporting requirements necessary to demonstrate compliance with the MACT limitations, work practice standards, and compliance dates have been incorporated to ensure compliance with MACT Limitations and Work Practice Standards.

Permit Condition 4.4, Opacity Limit

Emissions from Stacks EF-9, EF-10, EF-11, EF-12, and EF-14, 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.

MRRR - (Permit Conditions 3.8 through 3.9)

The facility is required to comply with the state opacity standard. The facility is required to report each instance where the requirements are not met.

Permit Condition 4.5, Use of Natural Gas in Fuel-burning Equipment

The permittee shall burn natural gas exclusively in the fuel-burning equipment at this facility.

MRRR

No MRRR has been required in the permit for this permit condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

6.4 General Provisions

Unless expressly stated, there are no MRRR for the general provisions.

General Compliance, Duty to Comply

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

General Compliance, Need to Halt or Reduce Activity Not a Defense

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

General Compliance, Duty to Supplement or Correct Application

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening, Additional Requirements, Material Mistakes, Etc.

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1),(2); 40 CFR 70.6(a)(6)(iii)]

Reopening, Permitting Actions

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d),(e)]

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98; Idaho Code §39-108; 40 CFR 70.6(b)(1),(2)]

Inspection and Entry

Upon presentation of credentials, the facility shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where a Tier I source is located or 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; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

New Applicable Requirements

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

Certification

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).

- Nothing in this permit shall alter or affect the following:
 - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;
 IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;
 IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00;
 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as specified.

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified;
- All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended,
 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

False Statements

The permittee may not 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]

No Tampering

The permittee may not 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]

Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months as specified.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required, Emissions Trading

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

In accordance with IDAPA 58.01.01.332, an “emergency” as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

7. REGULATORY REVIEW

7.1 Attainment Designation (40 CFR 81.313)

The facility is located in Canyon County which is designated as attainment or unclassifiable for PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone. Reference 40 CFR 81.313.

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

The facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for VOC and 10 tons per year for any one HAP (i.e., styrene) and 25 tons per year of all HAP combined, as demonstrated previously in the Emissions Inventory Section of this analysis. Therefore, this facility is classified as a major facility, as defined in IDAPA 58.01.01.008.10, and is subject to Tier I permitting requirements.

7.3 PSD Classification (40 CFR 52.21)

The facility is not a major facility for the purposes of the federal prevention of significant deterioration (PSD) program as referenced by IDAPA 58.01.01.205 because the facility does not emit nor has the potential to emit a regulated criteria air pollutant in amounts greater than or equal to the major source threshold for criteria pollutants of 250 T/yr.

BBS is not a designated facility defined in IDAPA 58.01.01.006, and fugitive emissions were not included when determining the major facility classification in accordance with IDAPA 58.01.01.008.10.c.

7.4 NSPS Applicability (40 CFR 60)

The facility is not subject to any New Source Performance Standards (NSPS) in 40 CFR 60.

7.5 NESHAP Applicability (40 CFR 61)

The facility is not subject to any National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR 61.

7.6 MACT Applicability (40 CFR 63)

The facility is subject to the requirements of 40 CFR 63, Subpart WWWW – National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. DEQ is not delegated this Subpart. In accordance with 40 CFR 63.5790(b), the affected sources located at the facility are open molding, polymer casting, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts the facility manufactures. Refer to PTC No. P-2010.0047, issued June 22, 2010 for the complete MACT applicability breakdown for the facility.

Based on a review of 40 CFR 63, Subpart WWWW, no updates were identified nor incorporated since the time of the most recent update to 40 CFR 63, Subpart WWWW of April 20, 2006 which were incorporated at the time of the initial Tier I permitting action (T1-2012.0067 Project 61131).

Consistent with the approach taken in the initial T1 permit action, MACT alternative emission limitations (40 CFR 63.5805) have not been incorporated into this renewal, because the VOC emission limit in Table 4.3 (Permit Condition 4.1) has effectively limited operations such that the 100 T/yr of organic HAP has not been exceeded. Incorporation of these limits may be revisited if this threshold is exceeded in the subsequent permit term. MACT initial notification was provided completed in accordance with 40 CFR 63.5905, so the

7.7 CAM Applicability (40 CFR 64)

Individual permit units at facilities that are subject to Title V permitting requirements (Tier I permits) may be subject to the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM). 40 CFR Part 64 requires CAM for units that meet the following three criteria:

- In accordance with 40 CFR 64.2(a)(1), the unit must have an emission limit for the pollutant;

- In accordance with 40 CFR 64.2(a)(2), the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- In accordance with 40 CFR 64.2(a)(3), the unit must have a pre-control potential to emit of greater than the major source thresholds.

The lamination area and blue bottom area are limited by emission limits for both VOC and PM₁₀. Within both the lamination and blue bottom areas there are units that have add-on controls such as fiberglass and cartridge filters. The facility as a whole has a pre-control potential to emit of VOC greater than major source thresholds, but there are no pollutant-specific emission units that have pre-control emissions greater than major source thresholds. Therefore, CAM (Subpart 64) does not apply to this facility.

7.8 Acid Rain Permit (40 CFR 72-75)

BBS is not an affected facility as defined in 40 CFR 72 through 75. Acid Rain permit requirements are therefore not applicable.

8. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a comment period was made available to the public. During this time, comments were not submitted in response to DEQ's proposed action. Refer to the Application Scope And Chronology section for a listing of relevant dates.

9. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for review and comment on March 19, 2018 via e-mail, and no comments were received. Refer to the Application Scope And Chronology section for a listing of relevant dates.

Appendix A - Emission Inventories

Table 2-3: Permit Chemical Usage Emissions Analysis

Feed Type	Component	Product Code(s)	Permit Analysis Quantity (lb/y)	Pollutant	Pollutant Conc. (wt%)	Pollutant in Feed (lb/y)	NEBAP Emission Factor (lb/ton Feed)	Pollutant Release/Conversion (wt%)	Pollutant Unabated Emissions (lb/y)	Operating Days per Year	Pollutant Unabated Emissions (lb/hr)	Control Equipment Efficiency (wt%)	Pollutant Controlled Emissions (lb/y)	Point Source ID
Active	Plastic	MA 200	1484	methacrylate	95%	888	0	0%	888	750	0.148	0	888	EP11 & 12
	Plastic	MA 200	1484	VOC	5%	75	0	0%	75		0.014	0	75	
Finishing	Tempra	644 Sevant	1481	formaldehyde	2%	8	0	0%	8	750	0.0014	0	8	EP11 & 12
	TRI Buffing Compound	TR1311	413	VOC	22%	83	0	0%	83		0.014	0	83	
Foam Fill	Hydrex Floor-matrix Plating	1027 F-AD5 'A' Component 'A'	5062	methacrylate	50%	3031	0	0%	3031	750	0.506	0	3031	EP11 & 12
	Component 'A'	6213	calcium carbonate, PM ₁₀	25%	3031	0	0%	3031	0.506		0	3031		
Gel & Barrier Coats	Aramid White	WD-15-9018	36314	calcium carbonate, PM ₁₀	25%	3031	0	0%	3031	750	0.506	0	3031	EP11 & 12
				calcium carbonate	25%	3031	0	0%	3031		0.506	0	3031	
				silica, amorphous, PM ₁₀	25%	3031	0	0%	3031		0.506	0	3031	
				silica, amorphous, PM _{2.5}	25%	3031	0	0%	3031		0.506	0	3031	
	Aramid Colors	WD-248113 WD-248102 WD-248105 WD-248117	37319	silica, amorphous, PM ₁₀	5%	3031	0	0%	3031	750	0.120	0	3031	EP11 & 12
				silica, amorphous, PM _{2.5}	0.5%	3031	0	0%	3031		0.012	0	3031	
				calcium carbonate	0.5%	3031	0	0%	3031		0.012	0	3031	
				silica	17%	3031	0	0%	3031		1.778	0	3031	
	Vapors Clear	EFC02043	16311	methacrylate	95%	31250	0	0%	31250	750	5.172	0	31250	EP11 & 12
				VOC	5%	31250	0	0%	31250		0.517	0	31250	
				silica	1%	31250	0	0%	31250		0.313	0	31250	
				calcium carbonate	1%	31250	0	0%	31250		0.313	0	31250	
Solvent covers (GP) all covers	Dianacol Amcor	3000	methacrylate	5%	153	0	0%	153	750	0.025	0	153	EP11 & 12	
			VOC	2%	61	0	0%	61		0.010	0	61		
			acetone	1%	30	0	0%	30		0.005	0	30		
			ethyl acetate	1%	30	0	0%	30		0.005	0	30		
Banner coat	VPEC-012	44830	acetone	2%	133	0	0%	133	750	0.022	0	133	EP11 & 12	
			VOC	3%	167	0	0%	167		0.028	0	167		
			acetone	1%	67	0	0%	67		0.011	0	67		
			ethyl acetate	1%	67	0	0%	67		0.011	0	67		
Initiators	MCP-88 MCP-91	36318	acetone	2%	728	0	0%	728	750	0.120	0	728	EP11 & 12	
			VOC	2%	728	0	0%	728		0.120	0	728		
			acetone	2%	728	0	0%	728		0.120	0	728		
			ethyl acetate	2%	728	0	0%	728		0.120	0	728		
Liquors	DDW-8	13701	VOC	43%	5482	181	3%	1700	750	2.268	0	1700	EP14	
			VOC	85%	453	0	0%	453		0.749	0	453		
			acetone	1%	34	0	0%	34		0.006	0	34		
			VOC	100%	165	0	0%	165		0.275	0	165		
Paints	LAKO HDSC	881	VOC	37%	38	0	0%	38	750	0.011	0	38	EP14	
			VOC	100%	38	0	0%	38		0.011	0	38		
			acetone	1%	10	0	0%	10		0.002	0	10		
			VOC	100%	10	0	0%	10		0.002	0	10		
Resins	Cov. Extern. Evocool, Hestan (EPTC) Resin, EACTON	181023	acetone	0.5%	353	1.1	0%	44	750	0.141	0	44	EP11 & 12	
			PM ₁₀	35%	353	78	0%	1922		0.817	0	1922		
			PM _{2.5}	3%	2192	78	0%	1510		0.218	0	1510		
			VOC	30%	353	78	0%	1922		0.817	0	1922		
Styrene Monomer	Raining 5490	24802	styrene	100%	2480	223	0%	223	750	0.482	0	223	EP11 & 12	
			VOC	100%	2480	223	0%	223		0.482	0	223		
Solvents	Chemical solvent	551	acetone	100%	551	0	0%	551	750	0.083	0	551	EP11 & 12	
			VOC	100%	551	0	0%	551		0.083	0	551		
Waxes & Surface Finishes	Finesse	FR-10 / MB	5072	VOC	100%	5072	0	0%	5072	750	0.845	0	5072	EP11 & 12
				VOC	100%	5072	0	0%	5072		0.845	0	5072	

Criteria Pollutants	Emission Rate		Point Source ID
	(lb/y)	(lb/hr)	
PM ₁₀	2.875	1.222	EP11 & 12
	0.758	0.252	EP11 & 12
	0.0220	0.0184	EP14
VOC	8.88	1.84	Total
	108.2	-	

Hazardous Air Pollutants	Emission Rate (lb/y)
Acetone	0.00
Chloroform	0.00
Chlorobenzene	0.00
Chloride	0.00
Formaldehyde	4.10
NO _x	0.00
Methyl methacrylate	0.74
Styrene	0.00
TOTAL	4.84

Notes: 1. See Table 2-2
 2. Individual pollutant emission factor equals the NEBAP HAP Emission Factor (see Table 2-1) adjusted for relative concentration of pollutant. Example: Vapor Coat MMA EP-1 Vapor Coat NEBAP HAP Emission Factor = 0.001 lb/ton Feed = 0.001 (HAP/ton feed) * 5% MMA in Feed = 0.0005 lb HAP emitted per lb of Vapor Coat Feed.
 3. Two particulate control filters used in series with an overall efficiency of 95.5 wt%, 90 wt% efficiency used for these calculations.
 4. Cobalt compounds in white gel coat and resin are not specifically identified but are assumed to be cobalt carboxylate, a listed HAP. Cobalt carboxylate is 34 wt% cobalt.
 5. MDI emission rate based on methods defined in "MDI/RMDI Emissions Reporting Guidelines for the Polyurethane Industry," by the Alliance for the Polyurethane Industry, 2002. See calculations in Appendix A.
 6. See Table 2-10 for Part HAP methods. Note that Accent Booth is only operated 2-3 days per week, 100 annual operating days used for these calculations.
 7. PM₁₀ "concentration" based on 5% of the rain applied + generated as PM₁₀ during the edge finishing and plumb hole cutting steps. 80% pollutant retention based on estimated capture and control efficiency of Trim Booth and filters. The Trim Booth discharge inside the building. It is assumed that any PM₁₀ not captured by the Trim Booth filters will package ultimately via EP11 and EP12, located in the adjacent production zone.

Table 2-4: Facility-Wide Combustion Emissions

FACILITY-WIDE DUTY:

Operating Assumptions: **12.865** MMBtu/hr / 1,020 MMBtu/MMscf = **24** hr/day
8,760 hr/yr

EMISSION FACTORS: NATURAL GAS COMBUSTION, AP-42 SECTION 1.4 (7/98)
Fuel Use: **0.303** MMscf/day
110.488 MMscf/year

Criteria Air Pollutants	Emission Factor	Emissions	
		lb/MMscf	T/yr
NO2	100	1.26E+00	5.52E+00
CO	84	1.06E+00	4.64E+00
PM10	7.6	9.59E-02	4.20E-01
PM2.5		9.59E-02	4.20E-01
SOx	0.6	7.57E-03	3.31E-02
		7.57E-03	3.31E-02
VOC	5.5	6.94E-02	3.04E-01
Lead	0.0005	6.31E-06	2.76E-05
Lead, continued			5.37E-03
		TOTAL	1.09E+01

lb/quarter
T/yr

Greenhouse Gas Emissions ⁶	
CO ₂	= 0.054 kg/scf Natural Gas
CO ₂	= 6.6E+03 Tons/year
CH ₄	= 0.00103 g/scf Natural Gas
CH ₄	= 1.3E-01 Tons/year
N ₂ O	= 0.0001 g/scf Natural Gas
N ₂ O	= 1.3E-01 Tons/year
Total CO ₂ e = CO ₂ + (CH ₄ * 25) * (N ₂ O * 298)	
CO₂e	= 6603.48 Tons/year
Total CO ₂ e = CO ₂ + (CH ₄ * 25) * (N ₂ O * 298)	

Hazardous Air Pollutants (HAPs) and Toxic Air Pollutants (TAPs)			
	lb/MMscf	lb/hr	EL (lb/hr)
PAH HAPs			
2-Methylnaphthalene	2.40E-05	3.03E-07	9.10E-05
3-Methylchloranthrene	1.80E-06	2.27E-08	2.50E-06
Acenaphthene	1.80E-06	2.27E-08	9.10E-05
Acenaphthylene	1.80E-06	2.27E-08	9.10E-05
Anthracene	2.40E-06	3.03E-08	9.10E-05
Benzo(a)anthracene	1.80E-06	2.27E-08	9.10E-05
Benzo(a)pyrene	1.20E-06	1.51E-08	2.00E-06
Benzo(b)fluoranthene	1.80E-06	2.27E-08	
Benzo(g,h,i)perylene	1.20E-06	1.51E-08	9.10E-05
Benzo(k)fluoranthene	1.80E-06	2.27E-08	
Chrysene	1.80E-06	2.27E-08	
Dibenzo(a,h)anthracene	1.20E-06	1.51E-08	
Dichlorobenzene	1.20E-03	1.51E-05	9.10E-05
Fluoranthene	3.00E-06	3.78E-08	9.10E-05
Fluorene	2.80E-06	3.53E-08	9.10E-05
Indeno(1,2,3-cd)pyrene	1.80E-06	2.27E-08	
Naphthalene	6.10E-04	7.69E-06	3.33
Naphthalene	6.10E-04	7.69E-06	9.10E-05
Phenanthrene	1.70E-05	2.14E-07	9.10E-05
Pyrene	5.00E-06	6.31E-08	9.10E-05
Polycyclic Organic Matter (POM)	7-PAH Group	1.44E-07	2.00E-06
Max. PAH		2.29E-05	2.00E-06
Non-PAH HAPs			
Benzene	2.10E-03	2.65E-05	8.00E-04
Formaldehyde	7.50E-02	9.46E-04	5.10E-04
Hexane	1.80E+00	2.27E-02	12
Toluene	3.40E-03	4.29E-05	25
Non-HAP Organic Compounds			
7,12-Dimethylbenz(a)anthracene	1.60E-05	2.02E-07	
Butane	2.10E+00	2.65E-02	
Ethane	3.10E+00	3.91E-02	
Pentane	2.60E+00	3.28E-02	119
Propane	1.60E+00	2.02E-02	
Metals (HAPs)			
Arsenic	2.00E-04	2.52E-06	1.50E-06
Barium	4.40E-03	5.55E-05	0.033
Beryllium	1.20E-05	1.51E-07	2.80E-05
Cadmium	1.10E-03	1.39E-05	3.70E-06
Chromium	1.40E-03	1.77E-05	0.033
Cobalt	8.40E-05	1.06E-06	0.0033
Copper	8.50E-04	1.07E-05	0.013
Manganese	3.80E-04	4.79E-06	0.067
Mercury	2.60E-04	3.28E-06	0.003
Molybdenum	1.10E-03	1.39E-05	0.333
Nickel	2.10E-03	2.65E-05	2.70E-05
Selenium	2.40E-05	3.03E-07	0.013
Vanadium	2.30E-03	2.90E-05	0.003
Zinc	2.90E-02	3.66E-04	0.667
Total Combustion HAPs =		0.106	ton/yr

NOTE: TAPs lb/hr emissions are 24-hour averages unless shown in bold. Bold emissions are annual averages for carcinogens.

**Table 2-11: Facility-Wide Potential
To Emit Emission Inventory**

Emissions Unit	PM10	SO2	CO	NOx	VOCs	Lead	CO2e
	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr	T/yr
Point Sources							
Lamination Area S, MAU1 - EF9	2.05	0.01	1.54	1.84	0.10	0.00	2.20E+03
Lamination Area N, MAU1 - EF10	2.05	0.01	1.54	1.84	0.10	0.00	2.20E+03
Blue Bottom N, MAU2- EF11	0.38	0.00	0.18	0.21	0.01	0.00	2.57E+02
Blue Bottom S, MAU2 - EF12	0.38	0.00	0.18	0.21	0.01	0.00	2.57E+02
Accent Booth - EF14	0.02						
Unit Heaters N	0.05	0.00	0.54	0.64	0.04	0.00	7.70E+02
Unit Heaters E	0.04	0.00	0.43	0.52	0.03	0.00	6.16E+02
Unit Heaters S	0.02	0.00	0.22	0.26	0.01	0.03	3.08E+02
All VOC Sources					108		
Fugitive Sources							
{For listed source categories only, see item 3 below in the instructions} NO LISTED SOURCES							
XXX	0	0	0	0	0		0
Totals	4.98	0.03	4.64	5.52	108.55	0.03	6.60E+03

**Table 2-12: Potential
To Emit Hazardous Air Pollutants**

Emissions Unit	HAP
	T/yr
Lamination Area S, EF9	98.3
Lamination Area N, EF10	
Blue Bottom N, EF11	
Blue Bottom S, - EF12	
Accent Booth - EF14	0.08
All Natural Gas Combustion Sources	1.06E-01
Totals	98.48

Appendix B – Odor Management Plan

BEST BATH SYSTEMS INC. (BBS) ODOR MANAGEMENT PLAN

Updated 7-7-2012

1. BBS will maintain negative pressure inside the building during operating hours by keeping doors to the facility closed.
2. BBS will keep all storage containers and vessels closed when not in use with exception of a 1" acceptable gap as specified by IDEQ.
3. BBS will continue using a series of two filters. First, a pre-filter with a collection efficiency rated at no less than 84%, then a secondary filter rated at no less than 72%. During operating hours the exhaust fans will be in operation before spraying takes place.
4. The door to the mixing tank room will be closed while extenders and fillers are being added to the resin matrix.
5. BBS will maintain records of all odor complaints received.
6. BBS will take appropriate corrective action as expeditiously as practicable on all complaints of merit.
7. BBS will maintain records of the assessment of the validity of complaints received.
8. BBS will maintain records of any corrective action taken, and the date the corrective action was taken.
9. BBS will hold annual employee training meetings to maintain our Odor Management Plan

Best Bath Systems

IDEQ odor complaint log

Date:

Name:

Preferred Contact Info:

Location, Date and Time of Complaint:

Reason for Complaint Description:

below for Best Bath use only

Best Bath Official Assessor:

Styrene levels at location:

Date:

Time:

Level:

Date:

Time:

Level:

Date:

Time:

Level:

Assessment of Merit:

Corrective Actions Taken:

Date Corrective Actions Completed:

Appendix C – O&M Manual for Dust Collection System

Operations and Maintenance Manual for **Dust Collection System:**

FILTER CHANGE SCHEDULE

All pre-filters (bulk fiberglass media or equivalent) will be inspected daily by the production staff or supervisor and changed when 90% obscured. Pre-filters will be inspected, evaluated and recorded weekly by a manager or compliance officer for quality assurance.

All secondary filters (1" Facet-Aire 3 or equivalent) will be inspected daily by the production staff or supervisor and changed when needed or weekly whichever is first. At anytime, a filter that is collapsed or otherwise not functioning properly should be replaced by staff or a supervisor. Secondary filters will be inspected, evaluated and recorded weekly by a manager or compliance officer.

Duct areas and casings behind filters are to be inspected weekly for evidence for non-functionality such as abnormal amounts of collected dust or bent or broken hardware.

All doors to the building are to remain closed unless in use to ensure proper engineered air flow.

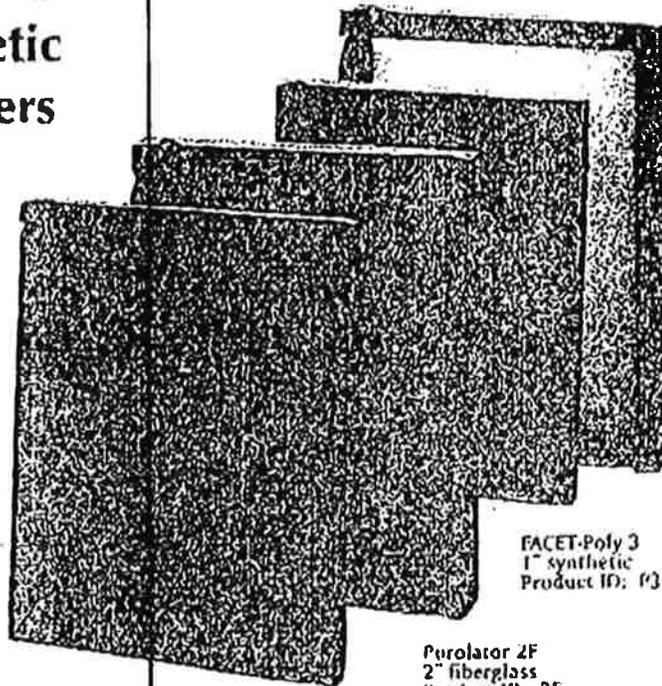
Filter Inspection log 0

DATE	INSPECTION AREA	SATISFACTORY	UNSATISFACTORY	CORRECTIVE ACTION	INSPECTED BY
7-11-12	Production Area	X			Hugo C
7-11-12	Blue Bottom	X			Hugo C
	Tooling Fabrication	X			Hugo C
7-11-12	Accounting	X			Hugo C
	Production		X	Replace filters	
7-16-12	Blue Bottom		X	Replace filters	
7-16-12	Accounting Booth	X			Hugo C
7-16-12	Tooling Fabrication	X			Hugo C
7-21-12	Production	X			
7-21-12	Tooling Fab		X	Replace filters	
7-21-12	Production	X			
7-21-12	Blue Bottom		X	Replace filters	
7-21-12	Production		X	Replace filters	Hugo C
7-31-12	Production Area	X			
7-31-12	Hydrate P		X	Replace filters	Hugo C
7-31-12	Tooling Fabrication	X			Hugo C
7-31-12	Blue Bottom		X	Replace all filters	
7-31-12	Account Booth		X	Turn over pre filters	
8-7-12	Production Area	X			HC
8-7-12	Production				HC
8-7-12	Blue Bottom	X			HC
8-7-12	Tooling Fabrication	X			HC
8-7-12	Accounting Booth	X			HC
8-15-12	Production	X			HC
8-15-12	Tooling Fab	X			HC
8-15-12	Blue Bottom		X	Change Cartridge filters	HC
8-15-12	Accounting Booth	X			HC
	Tooling Booth Area	X			HC
8-21-12	Tooling Fab	X			HC
8-21-12	Blue Bottom	X			HC
8-21-12	Accounting Booth		X	Replace filters	HC
8-21-12	Accounting Booth				
8-21-12	Production Area		X	Replace filters	HC
8-21-12	Blue Bottom		X	Replace filters	HC
8-21-12	Tooling Booth	X		Rep	HC
8-21-12	Production Booth		X	Replace filters	HC
9-5-12	Production Area	X			HC
9-5-12	Tooling Fab	X			HC
9-5-12	Account Booth	X			HC
9-5-12	Blue Bottom		X	Replace filters	HC
9-13-12	Blue Bottom	X			HC
9-13-12	Account Booth	X			HC

Industrial Strength 1" and 2" Fiberglass and Synthetic Disposable Panel Filters

The Purolator FACET-Aire 3 (1" fiberglass), Purolator 2F (2" fiberglass), and FACET-Poly 3 (1 1/2" synthetic) disposable panel filters are designed to withstand the demands of tough industrial and commercial applications. Purolator assures filter durability by utilizing construction features not found in traditional designs.

These filters perform best in conditions where large quantities of lint, dust, and other particles are present. Their rugged construction makes them industry leaders in the high-velocity system, pre-filter market.



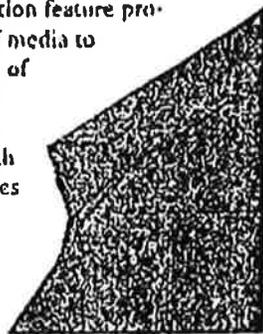
FACET-Poly 3
2" synthetic
Product ID: 2F

FACET-Poly 3
1" synthetic
Product ID: F312

Purolator 2F
2" fiberglass
Product ID: 2F

Monobond frame

The unique Purolator Monobond concept involves a one-piece frame sealed to the media under heat and pressure. This construction feature produces a continuous bond of media to board around the periphery of the frame eliminating weak corners and air bypass. The use of a high tensile strength polyethylene binder increases the integrity of the seal, allowing the filter to withstand varying temperatures and humidity levels.



Cut-away of the Purolator 2" monobond frame feature.

Each frame is produced using 100% recycled post consumer materials.

FACET-Aire 3
1" fiberglass
Product ID: F312

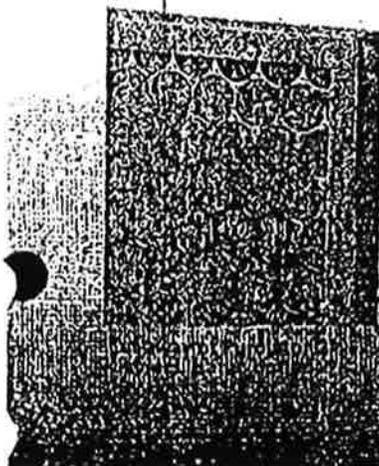
Freight cost and space savings

When compared to traditional designs, the Monobond type filter's notched frame corners allow units to interlock providing up to 33% savings on warehouse space and freight costs.



Channel frame

For certain heavy duty applications, Purolator also offers a 2" box frame construction available in sixteen (16) standard sizes. Both the upstream and downstream sides include triple pleating.



Scrim backing

Overall filter integrity is assisted by the addition of a Tri-Directional Scrim backing to the downstream side of both media types (monobond frame style only). This scrim backing is laminated to the media and provides downstream support while promoting minimum fiber displacement at high velocities and reducing restriction to air flow.

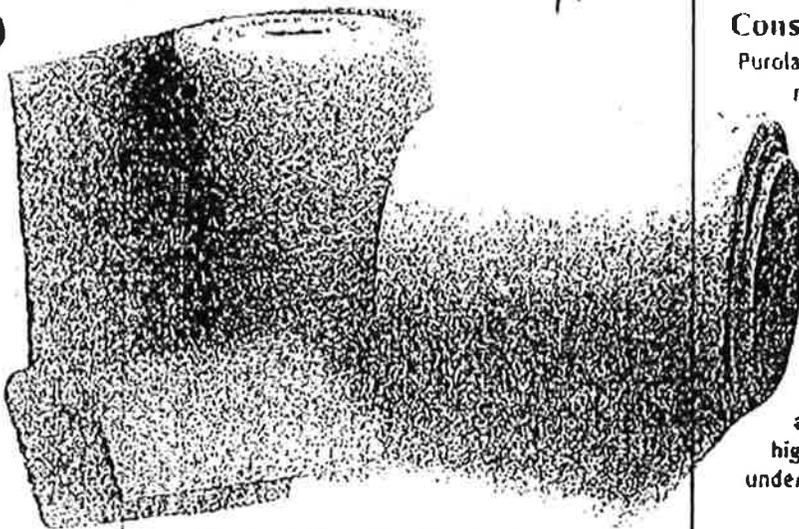


* Bulk Fiberglass Media

Construction

Purolator fiberglass media is made of 100% continuous filaments of spun glass, bonded with a thermosetting resin. This combination assures deep dirt penetration and high dust holding capacity as the filaments are electronically programmed to form effective high loft gradient density patterns.

A sturdy laminated backing on the downstream side, manufactured as an integral part of the media, reinforces the blue laminated glass media for greater strength. The backing also adds a final filter polish and provides the high tensile strength needed to prevent necking under tension in mechanical rolls.



Fiberglass bulk media roll and pads



Fiberglass bulk media cross section

Performance data

- Model number: 1172 BWL, 24 x 24 x 2
- Initial resistance: .08" w.g. at 300 FPM
- Initial atmospheric dust spot efficiency: <20%
- Average atmospheric dust spot efficiency: <20%
- Final resistance: 1.0" w.g.
- Average synthetic dust weight arrestance: 84%
- Dust holding capacity: 305 gms

Purolator fiberglass media is listed as Class 2 by Underwriters Laboratories. Testing on this product was performed in accordance with U.L. Standard 900.

Adhesive

Purolator fiberglass media is evenly coated with the adhesive Triaryl Phosphate (gel type). The adhesive is applied in precisely measured amounts using an ultra modern roller coater device. Its pseudo plastic nature prevents migration into air ducts.

Certification

Flash point is 325°F minimum on coated media and meets or exceeds all industrial standards. All Purolator media is tested under ASHRAE 52.1-1992 standards, with independent laboratory tests available upon request to qualified customers.

Fiberglass and Synthetic Pad and Frame System Filters

The Purolator filter pad holding frame consists of an 18-gauge perimeter frame enclosed by a 14-gauge 2x2 galvanized welded back grid. The front support is a 10-gauge hinged wire gate with prongs. Frames are punched for riveting or bolting together to form filter banks.

The 18-gauge construction is perfect for heavy-duty applications.

Durable construction

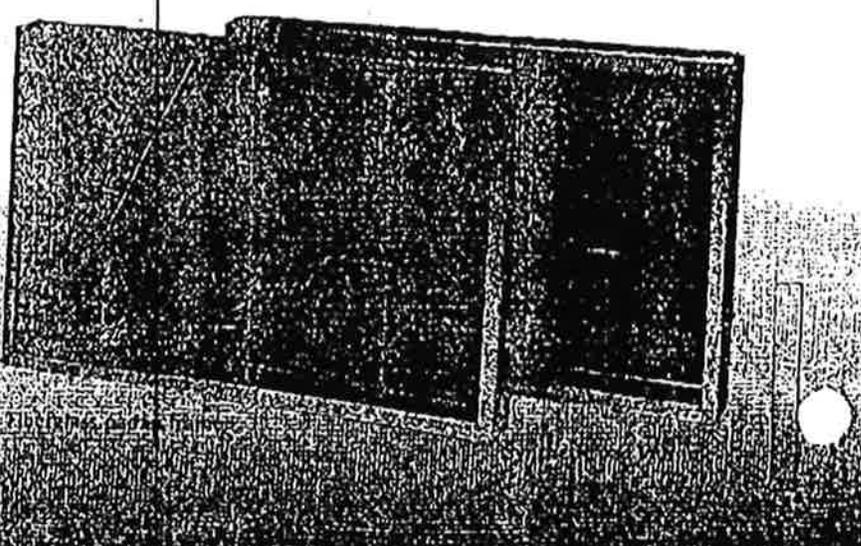
insures long service life.

All Purolator pad holding

frames are virtually maintenance-free. The design provides for full

access for full

access for full



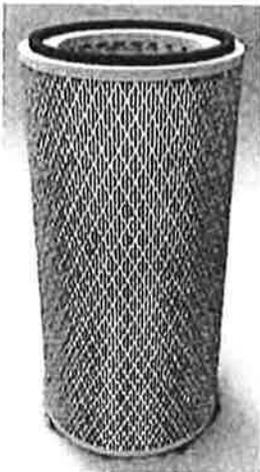
BAGHOUSE & INDUSTRIAL SHEET METAL SERVICES, INC.

1731 Pomona Rd
Corona, CA 92880-6963

“The Industrial Team”
Lic.# B656068

Phone: 951-272-6610
Fax: 951-272-1241
Web: 1888Baghouse.com

Technical Data Sheet for Part # BHC106B4

	Mfg Part Number	C106B4
	Style	Cartridge; Open/Closed w/ Bolt hole
	Dimensions	12 ³ / ₄ " O.D. x 8 ³ / ₈ " I.D. x 26" L
	Media (NanoBond)	MERV 15 (Ref Test # 2579)
	Pleats	313
	Surface Area	225 Square Feet
	End Caps	E.G. Metal
	Gasket	1/2" x 1/2" Polyisoprene (Qty 1 – on top)
	Inner Support	Helical Galv. Expanded Metal
	Outer Support	Galv. Expanded Metal
	Temperature Rating	240°F

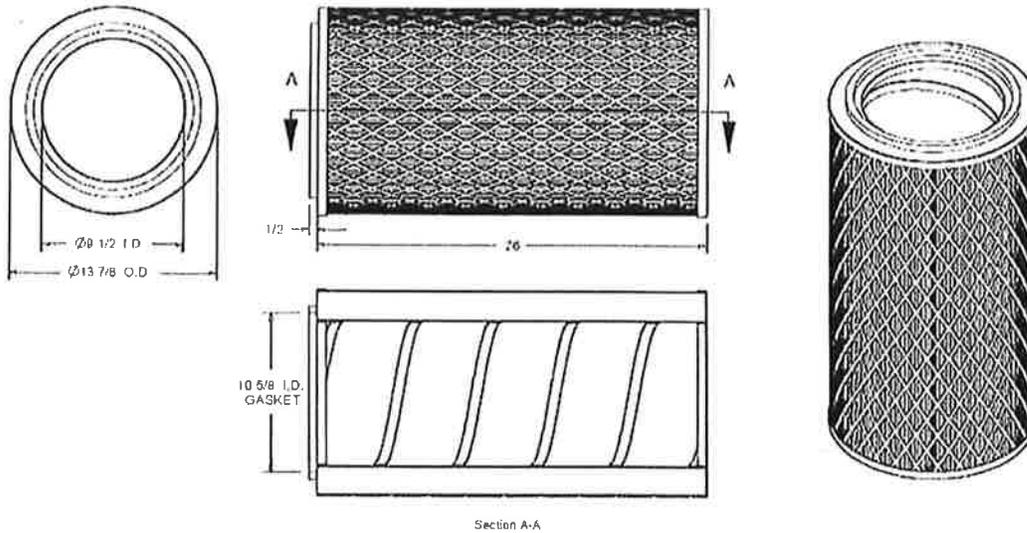
trim shop.

1/6 east plenum

10% in Tooling trim

Technical Data Sheet for Part # BH20A20

Mfg Part Number	BH20A20
Style	Cartridge; Open/Open
Dimensions	13 ⁷ / ₈ " O.D. x 9 ¹ / ₂ " I.D. x 26" L
Media (NanoBond)	MERV 15 (Ref Test # 2579)
Pleats	350
Surface Area	251.6 Square Feet
End Caps	E.G. Metal
Gasket	1/2" x 1/2" Polyisoprene (Qty 1 – on top)
Inner Support	Helical Galv. Expanded Metal
Outer Support	Galv. Expanded Metal
Temperature Rating	200°F



~~36 west plenum~~

16 east plenum

10 ~~5~~ too long trim

BAGHOUSE & INDUSTRIAL SHEET METAL SERVICES, INC.

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Corona, CA 92880-6963

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Lic.# B656068

Phone: 951-272-6610
Fax: 951-272-1241
Web: 1888Baghouse.com

Technical Data Sheet

BHC178P4

Mfg Part Number	C178P4
Style	Cartridge; Open/Open -Conical
Dimensions	16" O.D. x 11.5" I.D. (Top) x 12.75" OD x 8.375" ID (Bottom) x 26" L
Media	NANO
MERV Rating	15
Frazier Permeability	15
Fractional Efficiency	99.99 on .5 micron particles*
Pleats	390
Surface Area	280-sqft
End Caps	E.G. Metal
Gasket	½" x ½" Polyisoprene (Qty 1 – on top)
Inner Support	Helical Galv. Expanded Metal
Outer Support	Galv. Expanded Metal
Temperature Rating	200°F

trim shop

36 west plummer

Appendix D – Copy of Initial MACT Notification



January 31, 2018

To whom it may concern:

Please find the enclosed Initial Notification Form regarding permitting project T1-2017.0058 project 61962.

Sincerely,

Jay Multanen, CCT

Senior Operations Officer | Bestbath

723 Garber Street | Caldwell, ID 83605

C (208) 860-9157

@ Jay.Multanen@bestbath.com

/cc:

Morrie Lewis

Air Quality Permit Analyst

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EPA Region X

Director, Office of Air Quality,

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Seattle, WA 98101

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INITIAL NOTIFICATION FORM

Applicable Rule: 40 CFR Part 63, Subpart WWWW—National Emission Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production.

Please read the rule for detail on requirements and deadlines. Notification requirements are found in § 63.5905 , Table 13 to Subpart WWWW and § 63.9.

Please print or type the following information for each source subject to the applicable rule mentioned above.

Date: January 23, 2018

SOURCE INFORMATION (Physical location of the affected source) (§63.9(b)(2)(ii))

Source/Facility Name Best Bath Systems, Inc.

Source/Facility Physical Location

Street Address 723 Garber Street

City Caldwell State ID Zip Code 83605

Source/Facility Contact

Name Jay Multanen Title Secretary

Phone Number 208-860-9157

OWNER/OPERATOR INFORMATION (§63.9(b)(2)(i))

Owner/Operator Name Best Bath Systems, Inc.

Owner/Operator Address

Mailing Address 723 Garber Street

City Caldwell State ID Zip Code 83605

SUBJECTIVITY (choose one) (§63.9(b)(2)(iii) and (v))

The above facility:

- is** a major source subject to this NESHAP.
- is not** subject to this NESHAP. (this form does not need to be completed if this facility is not subject to this NESHAP)

COMPLIANCE DATE (choose one) (§63.9(b)(2)(iii))

The above facility:

- was an existing source that became a major source on or before April 21, 2003; therefore, the compliance date is April 21, 2006, or you must accept and meet an enforceable HAP emissions limit below the major source threshold prior to April 21, 2006.
- was an existing area source that became a major source after April 21, 2003; therefore, the compliance date is 3 years after becoming a major source or by April 21, 2006, whichever is later.
- was an existing source, and emits less than 100 tons/year (tpy) of organic HAP from the combination of all centrifugal casting and continuous lamination/casting operations at the time of initial compliance and subsequently increases its actual organic HAP to 100 tpy or more from these operations, which requires that the facility must now comply with the standards in 63.5805(b); therefore, the compliance date is 3 years of the date your semi-annual compliance report indicates your facility meets or exceeds the 100 tons/year threshold.
- is a new source and is a major source at startup; therefore, this facility must comply upon start-up or April 21, 2003, whichever is later.
- is a new source and is an area source at startup and becomes a major source; therefore, this facility must comply immediately upon becoming major source.
- is a new source, and emits less than 100 tpy of organic HAP from the combination of all open molding, centrifugal casting, continuous lamination/casting, pultrusion, sheet molding compound and bulk molding compound manufacturing, and mixing operations at the time of initial compliance and subsequently increases its actual organic HAP emissions to 100 tpy or more from the combination of these operations, which requires that the facility must now meet the standards in 63.5805(d); therefore, this facility must comply within 3 years from the date that your semi-annual compliance report indicates your facility meets or exceeds the 100 tpy threshold.

OPERATION INFORMATION (§63.9(b)(2)(iv))

HAP Emission Points

The following processes occur at the above facility (check all that apply):

- open molding;
- closed molding (e.g., compression molding, injection molding, and resin transfer molding);
- centrifugal casting;
- continuous lamination;
- continuous casting;
- polymer casting;(there are no HAP emissions limitations for polymer casting, but they must comply with other provisions of the rule such as initial notification and mixing operations at an affected polymer casting source must comply with the mixing requirements in the rule.)
- pultrusion;
- sheet molding compound manufacturing;
- bulk molding compound manufacturing;
- mixing
- cleaning of equipment used in reinforced plastic composite manufacture;
- HAP-containing materials storage; and
- Repair operations on parts the source also manufactures.
- Other HAP emissions processes (please describe all other processes at this facility that emit HAP

Spray application of paint coatings

Hazardous Air Pollutants

The above facility's:

Actual emissions of HAP emitted in 2002: NA tons per year
Potential to emit of HAP is 100.1 tons per year

Please provide a brief description of the nature, size, operating design capacity, and method of operation of the above facility: (You may copy the facility description in the permit or attached it to this form)
BBS produces fiberglass shower and tub units primarily using spray layup techniques on open molds.
Although the PTE operating design capacity is 100.1 tons HAPs/year, the facility has not exceeded and does not anticipate exceeding 60 tons HAPs/year. The facility uses 40 CFR 63.58010(c) to calculate Facility-Wide Organic HAP Emissions and demonstrate compliance with MACT Limits.

CERTIFICATION

Print or type the name and title of the Responsible Official for the plant.

Jay Multanen Secretary
(Name) (Title)

A Responsible Official can be:

- The president, vice-president, secretary, or treasurer of the company that owns the plant;
- The owner of the plant;
- The plant engineer or supervisor;
- A government official if the plant is owned by the Federal, State, city, or county government; or
- A ranking military officer if the source is located on a military base.

I certify the information contained in this report to be accurate and true to the best of my knowledge.

Jay Multanen January 31st, 2018
(Signature of Responsible Official) (Date)

MAILING ADDRESS

Please mail this completed form to both your State Air Pollution Control office and Your EPA Regional office (see addresses provided below):

EPA Region X (Alaska, Idaho, Oregon, Washington), Director, Office of Air Quality, 1200 Sixth Avenue (OAQ-107), Seattle, WA 98101.