



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Permit to Construct No. P-2009.0113

Final

NACO Industries

Preston, Idaho

Facility ID No. 041-00014

September 10, 2009

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Permit Writer

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

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Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAP	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
MACT	Maximum Achievable Control Technology
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
TAP	toxic air pollutant
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

1. FACILITY INFORMATION

1.1 Facility Description

NACO Industries is a fabricator of plastic pipe fittings that are used for a variety of residential, industrial, and commercial applications. The facility currently contains multiple natural gas combustion point sources (pipe heaters and space heating furnaces) and volatile organic compounds (VOC) emission generating area sources (gluing station operations).

NACO Industries uses standard length PVC plastic pipe as a raw material. The full lengths of pipe are cut into the required lengths on a saw. If a cut piece of pipe requires a drilled hole, it is taken to a router station for drilling. The cut pieces of pipe are then taken to the pulling station where they are placed on a heated pad and heated until they achieve the correct flexibility. At this time, a heated mandrel is placed inside the cut pieces of pipe to be pulled through the router hole.

The cut pieces of pipe are then placed in a glycol tank at the required depth and heated for the required amount of time according to the pipe thickness. After which they are moved to a beelling station and placed on a mandrel to make either a hub or a gasket end. When this process is finished, the cut pieces of pipe are taken to the trim-saw for any necessary trimming. If additional pieces of pipe need to be attached, the cut pieces of pipe are taken to the gluing station operation.

In the gluing station operation primer, epoxy, contact cement and other glues as listed in Table 3.1 are used to join the additional pieces of pipe in this operation. The finished plastic pipe fittings are then taken to the shipping area for quality assurance measurements. If a specific fitting requires a gasket, the gasket is glued in with contact cement prior to shipment.

Although the cutting, drilling, and trimming process releases a small amount of particulate matter into the air, these emissions are captured by a filtration system within the building and are not vented outside.

1.2 Permitting Action and Facility Permitting History

This PTC is a revision of an existing PTC. The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

January 6, 2009 DEQ issued PTC No. P-2008.0131 (S)

2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

2.1 Application Scope

This project is for a PTC revision to change the owner of the facility from Freedom Plastics, Inc. to NACO Industries and to change the name of the responsible official. No other substantive changes were made to the PTC.

2.2 Application Chronology

August 21, 2009 DEQ received a request for a PTC revision to change the ownership from Freedom Plastics, Inc. to NACO Industries and to change the name of the responsible official for the facility.

3. TECHNICAL ANALYSIS

3.1 Emission Unit and Control Device

For details regarding the emissions units and control devices used at this facility, refer to the Statement of Basis for the initial PTC No. P-2008.0131, issued on January 6, 2009. This information was not changed as a result of this project.

3.2 Emissions Inventory

For details regarding the emissions inventory for this facility, refer to the Statement of Basis for the initial PTC No. P-2008.0131, issued on January 6, 2009. This information was not changed as a result of this project.

3.3 Ambient Air Quality Impact Analysis

An ambient air quality impact analysis is not required for this project because the project does not result in a change in potential emissions of criteria pollutants and/or TAPs.

4. REGULATORY REVIEW

4.1 Attainment Designation (40 CFR 81.313)

The facility is located in Franklin County (AQCR 61), which is designated as attainment or unclassifiable for PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone. Reference 40 CFR 81.313.

4.2 Permit to Construct (IDAPA 58.01.01.201)

In accordance with IDAPA 58.01.01.209.06.b, any permit to construct, with or without transfer prohibition language, may be automatically transferred if:

- i. The current permittee notifies the Department at least thirty (30) days in advance of the proposed transfer date;
- ii. The notice provides written documentation signed by the current and proposed permittees containing a date for transfer of permit responsibility, designation of the proposed permittee's responsible official, and certification that the proposed permittee has reviewed and intends to operate in accordance with the permit terms and conditions; and
- iii. The Department does not notify the current permittee and the proposed permittee within thirty (30) days of receipt of the notice of the Department's determination that the permit must be revised pursuant to Subsection 209.04. If the Department does not issue such notice, the transfer is effective on the date provided in the notice described in Subsection 209.06.b.ii.

Since the facility did not notify the Department at least 30 days in advance of the proposed transfer date, a permit revision is required.

4.3 Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401 Tier II Operating Permits

The facility is not subject to IDAPA 58.01.01.300 through 399 and is not requesting an option Tier II operating permit. Therefore, the requirements of IDAPA 58.01.01.401 do not apply.

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

IDAPA 58.01.01.301 Tier I Operating Permit

The facility is not a Tier I source in accordance with IDAPA 58.01.01.006.113. Therefore, the requirements of IDAPA 58.01.01.301 do not apply.

4.5 PSD Classification (40 CFR 52.21)

For details regarding the PSD Classification for this facility, refer to the Statement of Basis for the initial PTC No. P-2008.0131, issued on January 6, 2009. This information was not changed as a result of this project.

4.6 NSPS Applicability (40 CFR 60)

For details regarding the NSPS applicability for this facility, refer to the Statement of Basis for the initial PTC No. P-2008.0131, issued on January 6, 2009. This information was not changed as a result of this project.

4.7 NESHAP Applicability (40 CFR 61)

For details regarding the NESHAP applicability for this facility, refer to the Statement of Basis for the initial PTC No. P-2008.0131, issued on January 6, 2009. This information was not changed as a result of this project.

4.8 MACT Applicability (40 CFR 63)

For details regarding the MACT applicability for this facility, refer to the Statement of Basis for the initial PTC No. P-2008.0131, issued on January 6, 2009. This information was not changed as a result of this project.

4.9 CAM Applicability (40 CFR 64)

For details regarding the CAM applicability for this facility, refer to the Statement of Basis for the initial PTC No. P-2008.0131, issued on January 6, 2009. This information was not changed as a result of this project.

4.10 Permit Conditions Review

Permit conditions were not revised as a result of this permitting action.

5. PERMIT FEES

In accordance to IDAPA 58.01.01.224.03, a permit to construct application fee is not required to be submitted for a change in the name or ownership of the holder of a permit to construct when the Department determines no other review or analysis is required.

6. PUBLIC COMMENT

An opportunity for public comment is not required for a permit revision where there is no increase in allowable emissions.

Appendix A – AIRS Information

AIRS/AFS Facility-wide Classification – Data Form

Facility Name: NACO Industries
Facility Location: 640 S. Hwy. 91, Preston, ID 83263
Facility ID: 041-00014 **Date:** August 26, 2009
Project/Permit No.: P-2009.0113 **Completed By:** Mary Capiral

- Check if there are no changes to the facility-wide classification resulting from this action. (compare to form with last permit)
 Comments:
- Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

	SO2	PM10	VOC
Area Classification:			

DO NOT LEAVE ANY BLANK

Check one of the following:

- SIP [0]** - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)
 OR
 Title V [V] - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:							

- PSD [6]** - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- NSR - NAA [7]** - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- NESHAP [8]** - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

- NSPS [9]** - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- MACT [M]** - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?