



Air Quality Permitting Statement of Basis

August 17, 2006

**Tier II Operating Permit and Permit to Construct
No. T2-050114**

flexcel – Post Falls, Post Falls

Facility ID No. 055-00038

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FINAL

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Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
HAPs	Hazardous Air Pollutants
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pound per hour
MACT	Maximum Available Control Technology
MMBtu	Million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₃	ozone
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
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
T/yr	Tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01 Sections 201 and 404.04, Rules for the Control of Air Pollution in Idaho (Rules) for Tier II operating permits and Permits to Construct.

2. FACILITY DESCRIPTION

flexcel – Post Falls manufactures office furniture at its Post Falls facility.

3. FACILITY / AREA CLASSIFICATION

The facility is defined as a synthetic minor facility, because the potential to emit of PM₁₀ has been limited to below 100 tons per year. The facility is no longer a major source subject to the Tier I operating requirements of IDAPA 58.01.01.300 through 386, because the proposed powder coating process changes to the facility are such that the facility does not have a potential to emit of VOCs above Tier I major source thresholds. The AIRS classification is “SM” because the potential to emit of CO, NO_x, SO₂, PM₁₀, and VOCs is less than major source levels.

The facility is located within AQCR 62 and UTM zone 11. The facility is located in Kootenai County which is designated as attainment/unclassifiable for all criteria pollutants (CO, NO_x, SO₂, lead, and ozone).

The AIRS information provided in Appendix A defines the classification for each regulated air pollutant at the facility. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

The facility has submitted a Tier II operating permit and PTC application which proposes to replace its current painting process with a powder coating process that will not use VOC containing compounds. Specifically, the facility proposes to replace six paint spray booths with four powder coating booths. In addition, the facility has requested to remove formaldehyde emission limits in existing PTC No. 055-00038, because it will no longer be using paint containing the chemical. This permitting action involves the modification of PTC No. 055-00038 and incorporation of those requirements into a Tier II operating permit which establishes the facility as a minor source no longer subject to the Tier I operating requirements of IDAPA 58.01.01.300 through 386. This permitting action also replaces the following permits:

Tier I Operating Permit No. T1-030102, issued April 1, 2003

PTC No. P-020123, issued January 27, 2003

Tier I Operating Permit No. 055-00038, issued September 3, 2002

PTC No. 055-00038, issued March 15, 2002

PTC No. 055-00038, issued March 30, 1998

PTC No. 055-00038, issued March 18, 1996

PTC No. 055-00038, issued October 2, 1995

PTC No. 055-00038, issued June 23, 1994

PTC No. 055-00038, issued January 11, 1993

4.1 Application Chronology

June 2, 2005	DEQ received application.
August 29, 2005	DEQ activated application.
September 23, 2005	DEQ determined application incomplete.
June 7, 2006	DEQ received additional information.
June 28, 2006	DEQ received additional information.
July 7, 2006	DEQ determined application complete.

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this Tier II and PTC.

5.1 Equipment Listing

Four powder coating booths replace the six paint spray booths. Each powder coating booth is equipped to collect excess powder overspray, and does not vent to outside air.

5.2 Emissions Inventory

No emission inventory has been submitted with this proposed project. The facility has certified that exhaust associated with powder coating booths is not released to the outside atmosphere. The facility has also certified that all liquid paint operations have ceased and all liquid painting systems have been removed from the facility.

5.3 Modeling

The proposed project involves the reduction of VOC and formaldehyde emissions, and no request to change PM₁₀ emissions. Modeling is not required for this type of permitting action.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this Tier II Operating Permit and PTC.

IDAPA 58.01.01.209.04.....Permit to Construct Required

This rule establishes the requirements for permit revisions. The facility has requested removal of permit conditions within its existing PTC, which would limit the potential of VOCs at the facility.

IDAPA 58.01.01.210.....Demonstration of Preconstruction Compliance with Toxic Standards

The facility has certified that paint operations no longer occur at the facility, that the proposed powder coating operations contain no formaldehyde, and that the facility has no other TAP emissions that would exceed any OEL, EL, ACC, or AACC listed in IDAPA 58.01.01.585 and 586.

IDAPA 58.01.01.401.....Tier II Operating Permit

This permit authorizes the use of a potential to emit limitation to exempt the facility from Tier I permitting requirements. The facility has requested removal of permit conditions within its existing PTC, which would limit the potential of VOCs at the facility.

IDAPA 58.01.01.404.....Procedure For Issuing Permit

The procedures for renewal, issuance and approval apply to this permit.

40 CFR 60, Subpart EE.....New Source Performance Standards for Surface Coating of Metal Furniture

This subpart establishes national emissions standards for Surface Coating of Metal Furniture. The affected facility to which the provisions of this subpart apply is each metal furniture surface coating operation in which organic coatings are applied. This subpart does not apply because the facility applies powder coatings, which in accordance with 40 CFR 60.311(a) are not included in the definition of an organic coating.

40 CFR 63, Subpart RRRRNational Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture

This subpart establishes national emissions standards for the surface coating of metal furniture. In accordance with 40 CFR 63.4881(c)(1), this subpart does not apply because the facility has certified that it uses only coatings, thinners, and cleaning materials that contain no organic HAP.

5.5 Fee Review

The Tier II processing fee was received on January 18, 2007.

Table 5.1 TIER II PROCESSING FEE SUMMARY

Emissions Inventory	
Pollutant	Permitted Emissions
NO _x	14.89
SO ₂	0.0
CO	0.0
PM ₁₀	6.13
VOC	0.0
TAPS/HAPS	0.0
Total:	23.17
Fee Due	\$ 5,000.00

6. PERMIT CONDITIONS

- Existing Permit Condition 1.1 pertaining to the NO_x emission limits of the dry-off oven burner, curing oven stacks, and burn-off oven has been revised.
- Permit Condition 3.3, 4.3, and 5.3 now contain the NO_x emission limits for the dry-off oven, curing oven, and burn-off oven, respectively. Burner stack 23 no longer exists at the facility, and the requirements of burner stack 23 have been removed from Permit Condition 3.3.
- The allowable fuels requirement of existing Permit Condition 2.3, which assures compliance with the NO_x emission limits, are contained in new Permit Conditions 3.4, 4.4, and 5.4.

- The burn-off oven operating requirements of existing Permit Conditions 2.7 through 2.9 and the monitoring and recordkeeping requirements of existing Permit Conditions 3.4 through 3.4.2, which all assure compliance with the NO_x emission limits, are contained in new Permit Conditions 5.4 through 5.8.2.
- The PM₁₀ emission limit of existing Permit Condition 1.3 has been renumbered to new Permit Condition 6.3.
- The operating, monitoring, and recordkeeping requirements of Permit Conditions 2.5, 2.6, 3.3, 3.7, 3.8, and 4.2, which assure compliance with the PM₁₀ emission limit, have been renumbered to Permit Conditions 6.4 through 6.10.
- The fugitive dust and opacity requirements of existing Permit Condition 1.5 and 1.6 are now in Permit Conditions 2.1 and 2.7 in the proposed permit.
- The following existing permit conditions have been revised by removing, or have been deleted, because they contain references to paint, painting operations, and toxics: 1.2, 1.4, 2.2, 2.4, 3.5, 3.8, and 4.1. These conditions have been revised, or deleted, because the facility has certified that paint operations no longer occur at the facility, that the proposed powder coating operations contain no formaldehyde, and that the facility has no other TAP emissions that would exceed any OEL, EL, ACC, or AACC listed in IDAPA 58.01.01.585 and 586. Specifically, the facility-wide VOC and formaldehyde emission limits of existing Permit Conditions 1.2 and 1.4 have been deleted.
- Permit Conditions 2.2, 2.4 and 4.1, which contain monitoring, recordkeeping, and reporting requirements related to the facility's former painting operations, have been deleted. Existing Permit Condition 3.5 and 3.8 have been renumbered to new Permit Condition 6.7 and 6.9.

7. PUBLIC COMMENT

7.1 *Regional Review of Draft Permit*

A draft copy of the permit and statement of basis was provided to the Coeur d'Alene Regional Office on August 9, 2006. Comments were received on August 22, 2006 and discussed with the regional office. Changes and clarification to permit conditions were made as requested by the regional office.

7.2 *Facility Review of Draft Permit*

A draft copy of the permit and statement of basis was provided to the facility on August 23, 2006. Comments were received on August 29, 2006 and discussed with the facility. Changes and clarification to permit conditions pertaining to the Reasons Spray Booth were made as requested by the facility.

7.3 *Public Comment*

In accordance with IDAPA 58.01.01.404.01.c, a public comment period on the proposed Tier II operating permit and application materials was held from November 30, 2006 to January 2, 2007. No formal comments were submitted.

8. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that flexcel - Post Falls be issued a Tier II and PTC No. T2-050114 for the proposed powder coating operations. A public comment period was provided in accordance with IDAPA 58.01.01.404.01.c. This project does not involve PSD requirements.

ABC/bf Permit No. T2-050114

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APPENDIX A
AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA
T2-050114

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: flexcel - Post Falls
Facility Location: Post Falls
AIRS Number: 055-00038

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO ₂	B							U
NO _x	B							U
CO	B						B	U
PM ₁₀	SM						SM	U
PT (Particulate)	SM						SM	U
VOC	B						B	U
THAP (Total HAPs)	B							U
APPLICABLE SUBPART								

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, **or** each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).