



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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C.L. "Butch" Otter, Governor  
John H. Tippets, Director

October 22, 2015

Phil Duckett, COO  
Ground Force Mfg.  
5650 E. Seltice Way  
Post Falls, ID 83854

RE: Facility ID No. 055-00122, Ground Force Mfg., Post Falls  
Final Permit Letter

Dear Mr. Duckett:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2014.0024 Project 61568 to Ground Force Mfg. located at Post Falls for including a new coating product, Turbo-Liner 11, in the list of approved coatings. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received August 3, 2015.

This permit is effective immediately and replaces PTC No. P-2014.0024, issued on November 5, 2014. This permit does not release Ground Force Mfg. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Coeur d'Alene Regional Office, 2110 Ironwood Pkwy., Coeur d'Alene, ID 83814, Fax (208) 769-1404.

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

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

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\drp

Permit No. P-2014.0024 PROJ 61568

Enclosures

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** Ground Force Mfg.  
**Permit Number** P-2014.0024  
**Project ID** 61568  
**Facility ID** 055-00122  
**Facility Location** 6001 E. Seltice Way (Surface Force)  
5650 E. Seltice Way (Underground Force)  
Post Falls, ID 83854

### Permit Authority

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

**Date Issued** October 22, 2015



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Darrin Pampaian, P.E., Permit Writer



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Mike Simon, Stationary Source Manager

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Appendix A – Spray Coating Materials

# 1 Permit Scope

## Purpose

- 1.1 This is a modification to an existing permit to construct (PTC) to include a new coating product, Turbo-Liner 11, in the list of approved coatings.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2014.0024, issued on November 5, 2014.

## Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Subpart XXXXXX Affected Source?	Regulated Sources	Control Equipment	Process Step	Location
2, 3	Yes <sup>(a)(b)</sup>	<u>Coating equipment, or equivalent <sup>(f)</sup></u> <i>Small paint booth with low-NO<sub>x</sub> heater</i> Date installed: 1985 Heat input capacity: ≤ 0.922 MMBtu/hr Fuel: natural gas only	<u>Filtration or equivalent <sup>(g)</sup></u> Manufacturer: Fiberbond Model: E.P. Red Media Control efficiency: 99.8% of PM	Prime and Paint	Surface Force
		<i>Large paint booth with low-NO<sub>x</sub> heater</i> Date installed: 1985 Heat input capacity: ≤ 4.55 MMBtu/hr Fuel: natural gas only			
		<u>Spray guns <sup>(f)</sup></u> Manufacturer: Iwata Models: LPH 200-LVP & 400-LVX Max. capacity: 4 gph, 1.9 gph			
2, 4	Yes <sup>(a)(c)</sup>	<u>Welding equipment, or equivalent <sup>(f)</sup></u> Stationary plasma cutter Portable electric plasma cutter 30 Portable electric welders Portable TIG welder 6 Portable electric welders 2 Electric cut off saws	Reasonable controls	Shear and Brake, Fabrication, Component Assembly, or Final Assembly	
2	No	Natural gas-fired pressure washer <sup>(f)</sup>	None	Wash and Prep	
2	No	Electric water evaporator <sup>(f)</sup>	Reasonable controls		
2, 6	Yes <sup>(a)(e)</sup>	Machining, grinding, and polishing equipment	Reasonable controls	Shear and Brake, Fabrication, or Final Assembly	

Permit Section	Subpart XXXXXX Affected Source?	Regulated Sources	Control Equipment	Process Step	Location
2, 3	Yes <sup>(a)(b)</sup>	<u>Coating equipment, or equivalent</u> <sup>(f)</sup> <i>Paint booth with low-NO<sub>x</sub> heater</i> Date installed: 1989 Heat input capacity: ≤ 0.32 MMBtu/hr Fuel: natural gas only	<u>Filtration or equivalent</u> <sup>(g)</sup> Manufacturer: Fiberbond Model: E.P. Red Media Control efficiency: 99.8% of PM	Prime and Paint	Underground Force
		<u>Spray guns</u> <sup>(f)</sup> Manufacturer: Iwata Models: LPH 200-LVP & 400-LVX Max. capacity: 4 gph, 1.9 gph			
		<i>Paint Storage</i>	Reasonable controls	Final Assembly	
2, 4	Yes <sup>(a)(c)</sup>	<u>Welding equipment, or equivalent</u> <sup>(f)</sup> Stationary plasma cutter 2 portable plasma cutters Portable electric plasma cutter Portable TIG welder 4 Portable electric welders 15 Stationary electric welders	Reasonable controls	Shear and Brake, Fabrication, or Final Assembly	
2, 5	Yes <sup>(a)(d)</sup>	Maintenance Shop Bead Blaster, or equivalent <sup>(f)</sup>	Reasonable controls	Fabrication	
2	No	Pressure washer, or equivalent <sup>(f)</sup>	None	Wash and Prep	
2, 6	Yes <sup>(a)(e)</sup>	Machining, and grinding equipment	Reasonable controls	Shear and Brake, Fabrication, or Final Assembly	

- (a) Initial applicability determinations pursuant to 40 CFR 63.11514(b)(1) through (5) (the 40CFR 63, Subpart XXXXXX – Recordkeeping permit condition).
- (b) A spray painting affected source is the collection of all equipment and activities necessary to perform spray-applied painting operations using paints which contain MFHAP, in accordance with 40 CFR 63.11514(b). A spray painting affected source includes all equipment used to apply cleaning materials to a substrate to prepare it for paint application (surface preparation) or to remove dried paint; to apply a paint to a substrate (paint application) and to dry or cure the paint after application; or to clean paint operation equipment (equipment cleaning).
- (c) A welding affected source is the collection of all equipment and activities necessary to perform welding operations which use materials that contain MFHAP, or have the potential to emit MFHAP, in accordance with 40 CFR 63.11514(b).
- (d) A dry abrasive blasting affected source is the collection of all equipment and activities necessary to perform dry abrasive blasting operations which use materials that contain MFHAP or that have the potential to emit MFHAP, in accordance with 40 CFR 63.11514(b).
- (e) A machining affected source is the collection of all equipment and activities necessary to perform machining operations which use materials that contain MFHAP, or that have the potential to emit MFHAP, in accordance with 40 CFR 63.11514(b). A dry grinding with machines affected source is the collection of all equipment and activities necessary to perform dry grinding with machines operations which use materials that contain MFHAP, or have the potential to emit MFHAP, in accordance with 40 CFR 63.11514(b).
- (f) “or equivalent” equipment is defined as equipment which has an equivalent or less maximum capacity and equivalent or lower pollutant emission rates (whether calculated based on maximum design capacity or based on established permit limits). Use of replacement equipment shall not result in an emission increase as defined in IDAPA 58.01.01.007. Use of replacement equipment shall not result in the emission of any regulated air pollutant not previously emitted. The number of spray booths, spray guns, cutters, welders, saws, pressure washers, and water evaporators at the facility is not limited as long as the permittee can demonstrate equivalency to DEQ.
- (g) “or equivalent” equipment is defined as equipment which has an equivalent or greater control efficiency and equivalent or lower pollutant emission rates (whether calculated based on maximum design capacity or based on established permit limits). Use of replacement equipment shall not result in an emission increase as defined in IDAPA 58.01.01.007, or in the emission of any regulated air pollutant not previously emitted. The number of spray booths, spray guns, cutters, welders, saws, pressure washers, and water evaporators at the facility is not limited as long as the permittee can demonstrate equivalency to DEQ.

## **2 Facility-Wide**

### **2.1 Visible Emissions Limit**

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 the test methods and procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides (NO<sub>x</sub>), and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this permit conditions.

### **2.2 Visible Emissions Observations**

Each day that the facility is operated, the permittee shall conduct a facility wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions to demonstrate compliance with the Visible Emissions Limit. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

### **2.3 Fugitive Dust Reasonable Precautions**

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, oil, 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; and
- Prompt removal of earth or other stored material from streets, where practical.

## 2.4 Fugitive Emissions Observations

Each day that the facility is operated, the permittee shall conduct a facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective for Fugitive Dust. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practical.

## 2.5 Fugitive Emissions Recordkeeping

The permittee shall maintain records of the results of each fugitive emissions inspection for Fugitive Emissions Control. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

## 2.6 40 CFR 63, Subpart XXXXXX – Fugitive Emission Determinations, General

Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR 60, Appendix A-7, in accordance with 40 CFR 63.11517(a). The permittee shall conduct the EPA Method 22 test while the affected source machining and grinding equipment as provided in Table 1.1 or otherwise determined) is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible fugitive emissions will be considered to be present if they are detected for more than six minutes of the fifteen-minute period.

## 2.7 40 CFR 63, Subpart XXXXXX – Fugitive Emission Determinations, Graduated Schedule

Visual determinations of fugitive emissions shall be performed in accordance with 40 CFR 63.11517(a) (the 40 CFR 63, Subpart XXXXXX – Fugitive Emission Determinations, General permit condition) and according to the schedule in 40 CFR 63.11517(b)(1) through (4), in accordance with 40 CFR 63.11517(b):

- *Daily Method 22 Testing.* Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process;
- *Weekly Method 22 Testing.* If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests for 10 days of work day operation of the process, the frequency of EPA Method 22 testing may be decreased to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, EPA Method 22 testing of that operation shall be resumed once per day during each day that the process is in operation;
- *Monthly Method 22 Testing.* If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests, the frequency of EPA Method 22 testing may be decreased to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, EPA Method 22 testing shall be resumed once per day during each day that the process is in operation; and
- *Quarterly Method 22 Testing.* If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with 40 CFR 63.11517(b)(3), the frequency of EPA Method 22 testing may be decreased to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, monthly EPA Method 22 shall be resumed.

## **2.8 40 CFR 63, Subpart XXXXXX – Visual Determination of Fugitive Emissions Reporting**

The annual certification and compliance report shall contain the information specified in 40 CFR 63.11519(b)(5)(i) through (iii) for each affected source (as provided in Table 1.1 or otherwise determined) which performs visual determination of fugitive emissions in accordance with 40 CFR 63.11517(a) (the 40 CFR 63, Subpart XXXXXX – Fugitive Emission Determinations, General permit condition) in accordance with 40 CFR 63.11519(b)(5):

- The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
- A description of the corrective actions taken subsequent to the test; and
- The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.

## **Odors**

### **2.9 Odors**

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776.

### **2.10 Odors Complaint Recordkeeping**

The permittee shall maintain records of all odor complaints received to demonstrate compliance with the odor emission limit (the Odors permit condition). The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

## **Process Weight Particulate Matter**

### **2.11 Process Weight Particulate Matter Limitation**

The permittee shall not emit PM to the atmosphere from any process or process equipment in excess of the amount shown by the equations in IDAPA 58.01.01.700-703.

## **NESHAP General Requirements**

### **2.12 40 CFR 63, Subpart XXXXXX - Definitions**

Metal fabrication and finishing hazardous air pollutant (MFHAP) means any compound of the following metals: cadmium, chromium, lead, manganese, or nickel, or any of these metals in the elemental form, with the exception of lead.

### **2.13 40 CFR 63, Subpart XXXXXX – Notification of Compliance Status**

The permittee shall submit notification(s) of compliance status in accordance with 40 CFR 63.11519(a)(2). For a new affected source (e.g., “or equivalent” equipment as defined in Table 1.1), the permittee shall submit a notification of compliance status within 120 days after initial startup. The permittee is required to submit the information specified in with the notification(s) of compliance status:

- The company’s name and address;
- A statement by a responsible official with that official’s name, title, phone number, email address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;
- For spray painting affected sources, the information required by 40 CFR 63.11516(e)(3)(vi)(C) or 40 CFR 63.11516(e)(4)(ix)(C), as applicable; and
- The date of the notification of compliance status.

### **2.14 40 CFR 63, Subpart XXXXXX – Annual Certification and Compliance Reports**

The permittee shall prepare and submit annual certification and compliance reports for each affected source (as provided in Table 1.1 or otherwise determined) according to the requirements of 40 CFR 63.11519(b)(2) through (7) (the 40 CFR 63, Subpart XXXXXX – Annual Certification and Compliance Report Dates, the 40 CFR 63, Subpart XXXXXX – General, 40 CFR 63, Subpart XXXXXX – Opacity Exceedance Reporting, and 40 CFR 63, Subpart XXXXXX – General permit conditions), in accordance with 40 CFR 63.11519(b)(1).

### **2.15 40 CFR 63, Subpart XXXXXX – Annual Certification and Compliance Report Dates**

Unless the EPA has approved or agreed to a different schedule for submission of reports under 40 CFR 63.10(a)(the NESHAP 40 CFR, 63, Subpart A - General Provisions permit condition), the permittee shall prepare and submit each annual certification and compliance report according to the dates specified in accordance with 40 CFR 63.11519(b)(2). Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation:

- The first annual certification and compliance report must cover the first annual reporting period, which begins the day after the compliance date and ends on December 31.
- Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.
- Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.

## 2.16 40 CFR 63, Subpart XXXXXX – General

The annual certification and compliance report must contain the information specified in accordance with 40 CFR 63.11519(b)(4), and the information specified in accordance with 40 CFR 63.11519(b)(5) through (7) that is applicable to each affected source (as provided in Table 1.1 or otherwise determined):

- Company name and address;
- Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and
- Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

## 2.17 40 CFR 63, Subpart XXXXXX – Recordkeeping

The permittee shall collect and keep records of the data and information specified in accordance with 40 CFR 63.11519(c) (the 40 CFR 63, Subpart XXXXXX – Recordkeeping, 40 CFR 63, Subpart XXXXXX – Manufacturer Instructions Recordkeeping, 40 CFR 63, Subpart XXXXXX – 40 CFR 63, Subpart XXXXXX – Welding Rod Usage Recordkeeping, and 40 CFR 63, Subpart XXXXXX – Recordkeeping permit conditions), according to the requirements in 40 CFR 63.11519(c)(15) (the 40 CFR 63, Subpart XXXXXX – Recordkeeping General Provisions permit condition).

- *General compliance and applicability records.* Maintain information specified in 40 CFR 63.11519(c)(1)(i) through (ii) for each affected source (as provided in Table 1.1 or otherwise determined);
  - Each notification and report that the permittee submitted to comply with 40 CFR 63, Subpart XXXXXX, and the documentation supporting each notification and report.
  - Records of the applicability determinations as in 40 CFR 63.11514(b)(1) through (5) (as provided in Table 1.1 or otherwise determined), listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.
- *Visual determination of fugitive emissions records.* Maintain a record of the information specified in 40 CFR 63.11519(c)(2)(i) through (iii) for each affected source which performs visual determination of fugitive emissions in accordance with 40 CFR 63.11517(a) (the 40 CFR 63, Subpart XXXXXX – Fugitive Emission Determinations, General permit condition);
  - The date and results of every visual determination of fugitive emissions;
  - A description of any corrective action taken subsequent to the test; and
  - The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.

- *Visual determination of emissions opacity records.* Maintain a record of the information specified in 40 CFR 63.11519(c)(3)(i) through (iii) for each affected source which performs visual determination of emissions opacity in accordance with 40 CFR 63.11517(c) (the 40 CFR 63, Subpart XXXXXX – Opacity Tier 2 or 3 Determinations, Graduated Schedule).
  - The date of every visual determination of emissions opacity;
  - The average of the six-minute opacities measured by the test; and
  - A description of any corrective action taken subsequent to the test.
- Maintain a record of the manufacturer's specifications for the control devices used to comply with 40 CFR 63.11516 (the 40 CFR 63, Subpart XXXXXX – Spray Coating, 40 CFR 63, Subpart XXXXXX – Spray System Recordkeeping, 40 CFR 63, Subpart XXXXXX – Recordkeeping, 40 CFR 63, Subpart XXXXXX – Control Equipment, 40 CFR 63, Subpart XXXXXX – Welding Emissions Management Plan (WEMP), 40 CFR 63, Subpart XXXXXX – Dry Abrasive Blasting, 40 CFR 63, Subpart XXXXXX – Machining, and 40 CFR 63, Subpart XXXXXX – Dry Grinding and Dry Polishing permit conditions).

**2.18 40 CFR 63, Subpart XXXXXX – Manufacturer Instructions Recordkeeping**

If the permittee complies with this subpart by operating any equipment according to manufacturer's instruction, these instructions shall be kept readily available for inspector review in accordance with 40 CFR 63.11519(c)(13).

**2.19 40 CFR 63, Subpart XXXXXX – Recordkeeping General Provisions**

The permittee shall maintain records in accordance with the monitoring and recordkeeping general provision and 40 CFR 63.11519(c)(15);

- Records shall be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1) (the NESHAP 40 CFR 63, Subpart A – General Provisions permit condition). Where appropriate, the records may be maintained as electronic spreadsheets or as a database.
- As specified in 40 CFR 63.10(b)(1) (the NESHAP 40 CFR 63, Subpart A – General Provisions permit condition), the permittee shall keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.
- The permittee shall keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to 40 CFR 63.10(b)(1) (the NESHAP 40 CFR 63, Subpart A – General Provisions permit condition). The permittee may keep the records off-site for the remaining 3 years.

# NESHAP General Requirements

## 2.20 NESHAP 40 CFR 63, Subpart A – General Provisions

The permittee shall comply with the applicable requirements of 40 CFR 63, Subpart A – General Provisions in accordance with 40 CFR 63.1. A summary of requirements for affected sources is provided in Table 2.2.

**Table 2.1 NESHAP 40 CFR 63, Subpart A – General Provisions for Affected Sources**

Section	Subject	Summary of Section Requirements
63.13	Addresses	<ul style="list-style-type: none"> <li>All requests, reports, applications, submittals, and other communications associated with 40 CFR 63, Subparts A and XXXXXXX shall be submitted to the following address and to the DEQ address specified (the DEQ Regional Office Address permit condition):               <ul style="list-style-type: none"> <li>Director Air and Waste</li> <li>EPA Region 10</li> <li>Air Operating Permits, OAQ-107</li> <li>1200 Sixth Avenue</li> <li>Seattle, WA 98101</li> </ul> </li> </ul>
63.4(a)	Prohibited Activities	<ul style="list-style-type: none"> <li>No permittee must operate any affected source in violation of the requirements of 40 CFR 63 in accordance with 40 CFR 63.4(a). No permittee subject to the provisions of 40 CFR Part 63 shall fail to keep records, notify, report, or revise reports as required under 40 CFR Part 63.</li> </ul>
63.4(b)	Circumvention/ Fragmentation	<ul style="list-style-type: none"> <li>No permittee shall build, erect, install or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard.</li> <li>Fragmentation which divides ownership of an operation, within the same facility among various owners where there is no real change in control, will not affect applicability in accordance with 40 CFR 63.4(c).</li> </ul>
63.6(b) and (c)	Compliance Dates	<ul style="list-style-type: none"> <li>The permittee of any new or reconstructed source must comply with the relevant standard as specified in 40 CFR 63.6(b).               <ul style="list-style-type: none"> <li>The permittee of a source that has an initial startup before the effective date of a relevant standard must comply not later than the standard's effective date in accordance with 40 CFR 63.6(b)(1).</li> <li>The permittee of a source that has an initial startup after the effective date of a relevant standard must comply upon startup of the source in accordance with 40 CFR 63.6(b)(2).</li> </ul> </li> <li>The permittee of any existing sources must comply with the relevant standard by the compliance date established in the applicable subpart or as specified in 40 CFR 63.6(c).               <ul style="list-style-type: none"> <li>The permittee of an area source that increases its emissions of hazardous air pollutants such that the source becomes a major source shall be subject to relevant standards for existing sources in accordance with 40 CFR 63.6(c)(5).</li> </ul> </li> </ul>
63.9	Notification Requirements	<ul style="list-style-type: none"> <li>The permittee of an affected source that has an initial startup before the effective date of a relevant standard shall notify in writing that the source is subject to the relevant standard, in accordance with 40 CFR 63.9(b)(2). The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information:               <ul style="list-style-type: none"> <li>The name and address of the permittee;</li> <li>The address (i.e., physical location) of the affected source;</li> <li>An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;</li> <li>A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and</li> <li>A statement of whether the affected source is a major source or an area source.</li> </ul> </li> <li>The permittee of a new or reconstructed major affected source for which an application for approval of construction or reconstruction is required must provide the following information in writing in accordance with 40 CFR 63.9(b)(4):               <ul style="list-style-type: none"> <li>A notification of intention to construct a new major-emitting affected source, reconstruct a major-emitting affected source, or reconstruct a major source such that the source becomes a major-</li> </ul> </li> </ul>

Section	Subject	Summary of Section Requirements
		<p>emitting affected source;  A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date.</p> <ul style="list-style-type: none"> <li>The permittee of a new or reconstructed affected source for which an application for approval of construction or reconstruction is not required must provide the following information in writing in accordance with 40 CFR 63.9(b)(5): <p>A notification of intention to construct a new affected source, reconstruct an affected source, or reconstruct a source such that the source becomes an affected source, and</p> <p>A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date.</p> <p>Unless the permittee has requested and received prior permission, the notification must include the information required in the application for approval of construction or reconstruction as specified in 40 CFR 63.5(d)(1).</p> </li> </ul>
63.10	Recordkeeping and Reporting Requirements	<ul style="list-style-type: none"> <li>The permittee shall maintain files of all required information recorded in a form suitable and readily available for expeditious inspection and review in accordance with 40 CFR 63.10(b)(1). The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site.</li> <li>If an permittee determines that his or her stationary source that emits one or more hazardous air pollutant (HAP), and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to a relevant standard because of limitations on the source's potential to emit or an exclusion, the permittee must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first in accordance with 40 CFR 63.10(b).</li> </ul>

**2.21 Incorporation of Federal Requirements**

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. Documents include, but are not limited to:

- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR 63, Subparts A and XXXXXX.

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments.

**2.22 DEQ Regional Office Address**

All requests, reports, applications, submittals, certifications, and other communications required by this permit shall be submitted to:

Air Quality Permit Compliance  
Department of Environmental Quality  
Coeur d'Alene Regional Office  
2110 Ironwood Parkway  
Coeur d'Alene, ID 83814

### 3 Coating

#### 3.1 Process Description

Equipment manufactured at the facility is coated using automotive-type coatings in colors and applications as approved by the customer. In addition, bed liner and anti-slip coatings are applied to walkways and limited surfaces as required by the customer.

[10/22/2015]

#### Emission Limits

#### 3.2 Emission Limits

Emissions from all coating activities shall not exceed any emission limit in Table 3.1, in accordance with IDAPA 58.01.01.203.02 and 58.01.01.210.

Table 3.1 Paint Spray Booth Emission Limits <sup>(a)</sup>

Source Description	PM <sub>10</sub> <sup>(b)</sup> (lb/hr) <sup>(c)</sup>	VOC (lb/hr) <sup>(c)</sup>	Any Individual HAP (lb/hr) <sup>(c)</sup>	Total HAP Combined (lb/hr) <sup>(d)</sup>
Paint spray booths	0.060	11.20	1.50	5.50

- (a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements. Limits are for both 5650 and 6001 E. Seltice Way locations (combined).
- (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, or DEQ-approved alternative.

## Operating Limits

### 3.3 Coating Material Usage

The permittee shall not use coating materials in excess of the coating material usage rate limits in Table 3.2, to ensure compliance with the Process Weight Particulate Matter Limitation and Emission Limits permit conditions.

Table 3.2 Coating Material Usage Limits <sup>(a)</sup>

Type of Coating Material <sup>(b)</sup>	Usage Rate Limit (gallons per day) <sup>(c)</sup>
Primers	10.0
Colors, bases, and binders	10.0
Activators and accelerators	6.0
Clears	10.0
Solvents, thinners, and reducers	10.0
Hardeners, fillers, and liners	5.75

- (a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements. Limits are for both 5650 and 6001 E. Seltice Way locations (combined).
- (b) A list of approved spray coating materials is provided in Appendix A.
- (c) Gallons of coating material type per calendar day (at both 5650 and 6001 E. Seltice Way locations).

### 3.4 Spray Guns and Spray Booth Systems

All spray coating at this facility, including application of primer, shall be conducted inside the booths with filter system in place, exhaust fans operating, and doors or curtains closed, in accordance with IDAPA 58.01.01.203.02 and 58.01.01.210. Each spray booth and spray gun shall meet management practice, transfer efficiency, and manufacturer requirements (the Spray Gun and Spray Booth Filter System, 40 CFR 63, Subpart XXXXXX – Spray Coating, 40 CFR 63, Subpart XXXXXX – Spray Gun Cleaning, and the 40 CFR 63, Subpart XXXXXX – Recordkeeping permit conditions), to ensure compliance with the Emission Limits permit condition) and the General Compliance general provision.

### 3.5 Spray Gun and Spray Booth Filter System

In accordance with IDAPA 58.01.01.203.02 and IDAPA 58.01.01.210.09:

- The permittee shall maintain and operate according to the manufacturer’s specifications and recommendations, spray booth filter system(s) with a minimum 99.8% capture efficiency for PM<sub>10</sub>.
- The permittee shall maintain and operate, according to the manufacturer’s specifications and recommendations, spray gun(s) with a minimum 65% transfer efficiency.
- The permittee shall not operate any spray gun outside of the spray booth.
- The permittee shall not operate any spray gun unless the spray booth filter system is installed and operating.

### 3.6 40 CFR 63, Subpart XXXXXX – Spray Coating

The permittee shall implement the management practices in 40 CFR 63.11516(d)(1) through (9) (the 40 CFR 63, Subpart XXXXXX - Spray Coating thru 40 CFR 63, Subpart XXXXXX – Spray Training Dates and Validity permit conditions) when a spray-applied paint that contains MFHAP

as defined in 40 CFR 63.11522 (the 40 CFR 63, Subpart XXXXXX – Definitions permit condition) is being applied, in accordance with 40 CFR 63.11516(d):

- *Standards for spray painting for MFHAP control.* All spray-applied painting of objects must meet the requirements of 40 CFR 63.11516(d)(1)(i) through (iii), in accordance with 40 CFR 63.11516(d)(1); and
  - Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.
  - All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 99.8 percent capture of MFHAP, in accordance with 40 CFR 63.11516(d)(1)(ii) and filter system requirements (the Spray Gun and Spray Booth Filter System permit condition). The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, “Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992” (incorporated by reference, see the 40 CFR 63.14, the NESHAP 40 CFR 63, Subpart A – General Provisions permit condition). The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.
  - The permittee shall perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer’s instructions, and maintain documentation of these activities, as detailed in 40 CFR 63.11519(c)(5)(the 40 CFR 63, Subpart XXXXXX – Recordkeeping).
- *Standards for spray painting application equipment of all objects painted for MFHAP control.* All paints applied via spray-applied painting must be applied with a high volume, low-pressure (HVLV) spray gun, electrostatic application, airless spray gun, air assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from EPA (the NESHAP 40 CFR 63, Subpart A – General Provision permit condition). The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLV spray gun must be equivalent to the California South Coast Air Quality Management District’s “Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989” and “Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002”, Revision 0 incorporated by reference (see 40 CFR 63.14, the NESHAP 40 CFR 63, Subpart A – General Provision permit condition).

**3.7 40 CFR 63, Subpart XXXXXX – Spray Gun Cleaning**

All cleaning of paint spray guns by the permittee must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent, in accordance with 40 CFR 63.11516(d)(4). Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used.

**Monitoring and Recordkeeping Requirements**

**3.8 Coating Material Purchase Records and Material Safety Data Sheet Recordkeeping**

- For each coating material on-site, including but not limited to each primer, color, base, binder, activator, accelerator, clear, solvent, thinner, reducer, hardener, filler, and liner coating, the permittee shall record and maintain the following records:
  - Coating material purchase records; and
  - Material Safety Data Sheets (MSDS).
- The permittee shall use only the coating materials specified in Appendix A to this permit, unless a replacement coating is demonstrated to result in equivalent or lower pollutant emission rates when compared to the coating replaced, calculated assuming maximum daily and annual usage (as limited by the Coating Material Usage permit condition) and compliance with permit limits. Records of each replacement coating equivalency demonstration shall be retained a minimum of five years in accordance with the Monitoring and Recordkeeping general provision, and for as long as the replacement coating is in use. Use of a replacement coating shall not result in an emission increase as defined in IDAPA 58.01.01.007. Use of a replacement coating shall not result in the emission of any regulated air pollutant not previously emitted.

**3.9 Coating Material Recordkeeping**

The permittee shall collect and maintain records of the following information to demonstrate compliance with the coating material usage limits (the Coating Material Usage permit condition):

- Each calendar day that spray coating is conducted, the quantity of each coating material used shall be monitored and recorded. For each coating material type listed in Table 3.2, the amount of coating material used shall be calculated and recorded.

**3.10 40 CFR 63, Subpart XXXXXX – Spray System Recordkeeping**

The permittee shall maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in 40 CFR 63.11519(c)(7) (the 40 CFR 63, Subpart XXXXXX – Recordkeeping permit condition), in accordance with 40 CFR 63.11516(d)(3).

### **3.11 40 CFR 63, Subpart XXXXXX – Spray Painting Worker Certification**

The permittee shall ensure that all workers performing painting are certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment, in accordance with 40 CFR 63.11516(d)(5). The minimum requirements for training and certification are described in 40 CFR 63.11516(d)(6) (the 40 CFR 63, Subpart XXXXXX – Spray Painting Training Program permit condition). The spray application of paint is prohibited by persons who are not certified as having completed the training described in 40 CFR 63.11516(d)(6). This requirement does not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets this permit condition. This requirement does not apply to operators of robotic or automated painting operations.

### **3.12 40 CFR 63, Subpart XXXXXX – Spray Painting Training Program**

The permittee shall ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by 40 CFR 63.11516(d)(5) (the 40 CFR 63, Subpart XXXXXX – Spray Painting Worker Certification permit condition), in accordance with 40 CFR 63.11516(d)(6). The training program shall include, at a minimum, the following items:

- A list of all current personnel by name and job description who are required to be trained;
- Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
  - Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.
  - Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.
  - Routine spray booth and filter maintenance, including filter selection and installation.
  - Environmental compliance with the requirements of this subpart.
- A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in 40 CFR 63.11516(d)(6)(ii) are not required to provide the initial training to these painters.

### **3.13 40 CFR 63, Subpart XXXXXX – Spray Painting Training Recordkeeping**

The permittee shall maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in 40 CFR 63.11519(c)(8) (the 40 CFR 63, Subpart XXXXXX – Recordkeeping permit condition), in accordance with 40 CFR 63.11516(d)(7).

### 3.14 40 CFR 63, Subpart XXXXXX – Spray Training Dates and Validity

The permittee shall ensure that all personnel, including contract personnel, which spray apply paints are trained (as required by the 40 CFR 63, Subpart XXXXXX – Spray Painting Worker Certification permit condition) and certified no later than July 25, 2011, or 180 days after hiring, whichever is later, in accordance with 40 CFR 63.11516(c)(8). Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified (the 40 CFR 63, Subpart XXXXXX – Spray Painting Training Program permit condition), satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

Training and certification will be valid for a period not to exceed 5 years after the date the training is completed, in accordance with 40 CFR 63.11516(c)(9). All personnel must receive refresher training that meets the requirements of this permit condition and be re-certified every 5 years.

### 3.15 40 CFR 63, Subpart XXXXXX – Recordkeeping

The permittee shall collect and keep records of the data and information specified in accordance with 40 CFR 63.11519(c) (the 40 CFR 63, Subpart XXXXXX – Recordkeeping, 40 CFR 63, Subpart XXXXXX – Manufacturer Instructions Recordkeeping, 40 CFR 63, Subpart XXXXXX – Welding Rod Usage Recordkeeping, and 40 CFR 63, Subpart XXXXXX – Recordkeeping permit conditions), according to the requirements in 40 CFR 63.11519(c)(15) (the 40 CFR 63, Subpart XXXXXX – Recordkeeping General Provision permit condition):

- *Spray paint booth filter records.* Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with 40 CFR 63.11516(d)(1)(ii) and (iii) (the 40 CFR 63, Subpart XXXXXX – Spray Coating permit condition);
- *HVLP or other high transfer efficiency spray delivery system documentation records.* Maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems, in compliance with 40 CFR 63.11516(d)(3) (the 40 CFR 63, Subpart XXXXXX – Spray Gun Cleaning permit condition). This documentation shall include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If written approval for an alternative spray application system has been obtained in accordance with 40 CFR 63.11516(d)(2) (the 40 CFR 63, Subpart XXXXXX – Spray Coating permit condition), a record of that approval shall be maintained along with documentation of the demonstration of equivalency; and
- *HVLP or other high transfer efficiency spray delivery system employee training documentation records.* Maintain certification that each worker performing spray painting operations has completed the training specified in 40 CFR 63.11516(d)(6) (the 40 CFR 63, Subpart XXXXXX – Spray Painting Training Program permit condition), with the date the initial training and the most recent refresher training was completed.

## 4 Welding

### 4.1 Process Description

Equipment is manufactured from plate steel and structural steel at the facility using saws and plasma tables to form materials into dimensions appropriate for manufacturing equipment. These materials are also rolled and formed using rollers and presses to bend the steel into shapes appropriate for cylinders, tanks, and vessels.

[10/22/2015]

### Operating Limits

#### 4.2 Welding Rod Usage

The permittee shall not exceed the welding rod usage limits in Table 4.1, in accordance with IDAPA 58.01.01.203.02.

Table 4.1 Welding Rod Usage Limits

Welding Rod Material	Annual Usage Limit (lb/yr) <sup>(a)</sup>
Select Arc 820Ni1	10,400
Total of all welding rod materials (combined)	29,035

(a) Pounds of welding rod material per any consecutive 12-calendar month period, calculated as a 12-month rolling total. Limits are for both 5650 and 6001 E. Seltice Way locations (combined).

#### 4.3 40 CFR 63, Subpart XXXXXX – Control Equipment

The permittee shall comply with the requirements in 40 CFR 63.11516(f)(1) and (2) for each welding operation that uses materials that contain MFHAP as defined in 40 CFR 63.11522 (the 40 CFR 63, Subpart XXXXXX – Definitions permit condition), or has the potential to emit MFHAP, in accordance with 40 CFR 63.11516(f) and IDAPA 58.01.01.210.

- The permittee shall operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. The permittee shall demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in 40 CFR 63.11519(c)(4) (the 40 CFR 63, Subpart XXXXXX – Recordkeeping permit condition);
- The permittee shall implement one or more of the management practices specified in 40 CFR 63.11516(f)(2) to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment:
  - Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));
  - Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;
  - Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;
  - Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and

- Use a welding fume capture and control system, operated according to the manufacturer's specifications.

## Monitoring

### 4.4 40 CFR 63, Subpart XXXXXX – Welding Rod Usage Recordkeeping

The permittee shall maintain records demonstrating welding rod usage on a rolling 12-month basis to demonstrate compliance with the welding rod usage limits (the Welding Rod Usage permit condition), and in accordance with 40 CFR 63.11519(c)(14) and IDAPA 58.01.01.210.

- On a monthly basis, the type and amount of each welding rod material used and the total of all welding rod materials used at both locations shall be monitored and recorded.
- On a monthly basis, the 12-consecutive-calendar month welding rod material usage total shall be calculated and recorded.

### 4.5 40 CFR 63, Subpart XXXXXX – Opacity Tier 2 or 3 Determinations, General

Visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9 of 40 CFR part 60, Appendix A-4, and while the affected source (welding equipment as provided in Table 1.1 or as otherwise determined) is operating under normal conditions, in accordance with 40 CFR 63.11517(c). The duration of the EPA Method 9 test shall be thirty minutes.

### 4.6 40 CFR 63, Subpart XXXXXX – Opacity Tier 2 or 3 Determinations, Graduated Schedule

The permittee shall perform visual determination of emissions opacity in accordance with 40 CFR 63.11517(c) (the 40 CFR 63, Subpart XXXXXX – Welding Rod Usage Recordkeeping permit condition) and according to the schedule in 40 CFR 63.11517(d)(1) through (5), in accordance with 40 CFR 63.11517(d);

- *Daily Method 9 testing for welding, Tier 2 or 3.* Perform visual determination of emissions opacity once per day during each day that the process is in operation.
- *Weekly Method 9 testing for welding, Tier 2 or 3.* If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed does not exceed 20 percent for 10 days of operation of the process, the frequency of EPA Method 9 testing may be decreased to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, testing shall be resumed every day of operation of the process.
- *Monthly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests does not exceed 20 percent for four consecutive weekly tests, the frequency of EPA Method 9 testing may be decreased to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, testing shall be resumed every five days of operation of the process.

- *Quarterly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests does not exceed 20 percent for three consecutive monthly tests, the frequency of EPA Method 9 testing may be decreased to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, testing shall be resumed every 21 days (month) of operation of the process.
- *Return to Method 22 testing for welding, Tier 2 or 3.* If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests does not exceed 20 percent, monthly and quarterly EPA Method 22 testing may be resumed (the 40 CFR 63, Subpart XXXXXX – Fugitive Emission Determinations, Graduated Schedule permit condition). In lieu of this, the permittee may elect to continue performing EPA Method 9 tests in accordance with 40 CFR 63.11517(d)(3) and (4).

#### 4.7 40 CFR 63, Subpart XXXXXX – Opacity Tier 1 Determinations

The permittee shall demonstrate that management practices or fume control measures are being implemented by complying with the requirements in 40 CFR 63.11516(f)(3) through (8), in accordance with 40 CFR 63.11516(f) and IDAPA 58.01.01.210. The requirements in 40 CFR 63.11516(f)(1) through (8) do not apply when welding operations are being performed that do not use any materials containing MFHAP (as defined in the 40 CFR 63, Subpart XXXXXX – Definitions permit condition) or do not have the potential to emit MFHAP.

- *Tier 1 compliance requirements for welding.* Visual determinations of welding fugitive emissions shall be performed as specified in 40 CFR 63.11517(b) (the 40 CFR 63, Subpart XXXXXX – Fugitive Emission Determinations, Graduated Schedule permit condition), at the primary vent, stack, exit, or opening from the building containing the welding operations. A record of all visual determinations shall be kept of fugitive emissions along with any corrective action taken in accordance with the requirements in 40 CFR 63.11519(c)(2) (the 40 CFR 63, Subpart XXXXXX – Recordkeeping permit condition);
- *Requirements upon initial detection of visible emissions from welding.* If visible fugitive emissions are detected during any visual determination, comply with the following requirements;
  - Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with 40 CFR 63.11516(f)(2). After completing such corrective actions, a follow-up inspection shall be performed for visible fugitive emissions in accordance with 40 CFR 63.11517(a) (the 40 CFR 63, Subpart XXXXXX – Fugitive Emission Determinations, General permit condition) at the primary vent, stack, exit, or opening from the building containing the welding operations.
  - Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with the annual certification and compliance report as required by 40 CFR 63.11519(b)(5) (the 40 CFR 63, Subpart XXXXXX – Visual Determination of Fugitive Emissions Reporting permit condition).

#### 4.8 40 CFR 63, Subpart XXXXXX – Tier 2 Visible Emissions

The permittee shall demonstrate that management practices or fume control measures are being implemented by complying with the requirements in 40 CFR 63.11516(f)(3) through (8), in accordance with 40 CFR 63.11516(f) and IDAPA 58.01.01.210. The requirements in 40 CFR 63.11516(f)(1) through (8) do not apply when welding operations are being performed that do not use any materials containing MFHAP (as defined in the 40 CFR 63, Subpart XXXXXX – Definitions permit condition) or do not have the potential to emit MFHAP:

- *Tier 2 requirements upon subsequent detection of visible emissions.* If visible fugitive emissions are detected more than once during any consecutive 12-month period (notwithstanding the results of any follow-up inspections), the permittee shall comply with 40 CFR 63.11516(f)(5)(i) through (iv).
  - Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, a visual determination of emissions opacity shall be conducted as specified in 40 CFR 63.11517(c) (the 40 CFR 63, Subpart XXXXXX – Welding Rod Usage Recordkeeping permit condition) at the primary vent, stack, exit, or opening from the building containing the welding operations.
  - In lieu of the requirement of 40 CFR 63.11516(f)(3) to perform visual determinations of fugitive emissions with EPA Method 22, visual determinations of emissions opacity shall be performed in accordance with 40 CFR 63.11517(d) (the 40 CFR 63, Subpart XXXXXX – Opacity Tier 2 or 3 Determinations, Graduated Schedule permit condition) using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
  - A record of each visual determination of emissions opacity performed in accordance with 40 CFR 63.11516(f)(5)(i) or (ii) shall be kept, along with any subsequent corrective action taken, in accordance with the requirements in 40 CFR 63.11519(c)(3) (the 40 CFR 63, Subpart XXXXXX – Recordkeeping permit condition).
  - The results of all visual determinations of emissions opacity performed in accordance with 40 CFR 63.11516(f)(5)(i) or (ii) shall be reported, along with any subsequent corrective action taken, and submitted with the annual certification and compliance report as required by 40 CFR 63.11519(b)(6) (the 40 CFR 63, Subpart XXXXXX – Opacity Reporting permit condition).
- *Requirements for opacities less than or equal to 20 percent but greater than zero.* For each visual determination of emissions opacity performed in accordance with 40 CFR 63.11516(f)(5) for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, corrective actions shall be performed, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with 40 CFR 63.11516(f)(2) (the 40 CFR 63, Subpart XXXXXX – Tier 2 Visible Emissions permit condition).

#### 4.9 40 CFR 63, Subpart XXXXXX – Tier 3 Visible Emissions

The permittee shall demonstrate that management practices or fume control measures are being implemented by complying with the requirements in 40 CFR 63.11516(f)(3) through (8), in accordance with 40 CFR 63.11516(f) and IDAPA 58.01.01.210. The requirements in 40 CFR 63.11516(f)(1) through (8) do not apply when welding operations are being performed that do not use any materials containing MFHAP (as defined in the 40 CFR 63, Subpart XXXXXX – Definition permit condition) or do not have the potential to emit MFHAP.

- *Tier 3 requirements for opacities exceeding 20 percent.* For each visual determination of emissions opacity performed in accordance with 40 CFR 63.11516(f)(5) for which the average of the six-minute average opacities recorded exceeds 20 percent, the permittee shall comply with the requirements in 40 CFR 63.11516(f)(7)(i) through (v).
  - The permittee shall submit a report of exceedance of 20 percent opacity, along with the annual certification and compliance report, as specified in 40 CFR 63.11519(b)(8) (the 40 CFR 63, Subpart XXXXXX – Opacity Exceeding Reporting permit condition), and according to the requirements of 40 CFR 63.11519(b)(1) (the 40 CFR 63, Subpart XXXXXX – Annual Certification and Compliance Reports permit condition).
  - Within 30 days of the opacity exceedance, a WEMP shall be prepared and implemented, as specified in 40 CFR 63.11516(f)(8) (the 40 CFR 63, Subpart XXXXXX – Welding Emissions Management Plan (WEMP) permit condition). If a WEMP has already been prepared, a revised WEMP shall be prepared and implemented within 30 days.
  - During the preparation (or revision) of the WEMP, visual determinations of emissions opacity shall continue to be performed, beginning on a daily schedule as specified in 40 CFR 63.11517(d), (the 40 CFR 63, Subpart XXXXXX – Opacity Tier 2 or 3 Determinations, Graduated Schedule permit condition) using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.
  - Records of daily visual determinations of emissions opacity during preparation of the WEMP shall be maintained in accordance with the requirements in 40 CFR 63.11519(b)(9) (the 40 CFR 63, Subpart XXXXXX – WEMP Reporting permit condition).
  - Records shall be included in the annual certification and compliance report, according to the requirements of 40 CFR 63.11519(b)(1) (the 40 CFR 63, Subpart XXXXXX – Annual Certification and Compliance Reports permit condition).

#### **4.10 40 CFR 63, Subpart XXXXXX – Welding Emissions Management Plan (WEMP)**

The permittee shall demonstrate that management practices or fume control measures are being implemented by complying with the requirements in 40 CFR 63.11516(f)(3) through (8), in accordance with 40 CFR 63.11516(f) and IDAPA 58.01.01.210. The requirements in 40 CFR 63.11516(f)(1) through (8) do not apply when welding operations are being performed that do not use any materials containing MFHAP (as defined in the 40 CFR 63, Subpart XXXXXX – Definitions permit condition) or do not have the potential to emit MFHAP.

- The Site-Specific Welding Emissions Management Plan (WEMP) shall comply with the requirements in 40 CFR 63.11516(f)(8)(i) through (iii). WEMP shall contain:
  - Company name and address;
  - A list and description of all welding operations which currently comprise the welding affected source (as provided in Table 1.1 or otherwise determined);
  - A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;
  - A list and description of all management practices and/or fume control methods currently employed for the welding affected source;
  - A description of additional management practices and/or fume control methods to be implemented pursuant to 40 CFR 63.11516(f)(7)(ii), and the projected date of implementation; and

- Any revisions to a WEMP must contain copies of all previous plan entries, pursuant to 40 CFR 63.11516(f)(8)(i)(D) and (E).
- The WEMP must be updated annually to contain current information, as required by 40 CFR 63.11516(f)(8)(i)(A) through (C), and submitted with the annual certification and compliance report, according to the requirements of 40 CFR 63.11519(b)(1) (the 40 CFR 63, Subpart XXXXXX – Annual Certification and Compliance Reports permit condition).
- A copy of the current WEMP shall be maintained in a readily-accessible location for inspector review, in accordance with the requirements in 40 CFR 63.11519(c)(12) (the 40 CFR 63, Subpart XXXXXX – WEMP Reporting permit condition).

**4.11 40 CFR 63, Subpart XXXXXX – WEMP Preparation Recordkeeping**

The permittee shall maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a WEMP, in accordance with 40 CFR 63.11519(c)(11) and 40 CFR 63.11516(f)(7)(iii) (the 40 CFR 63, Subpart XXXXXX – Tier 3 Visible Emissions permit condition).

**4.12 40 CFR 63, Subpart XXXXXX – WEMP Recordkeeping**

The permittee shall maintain a copy of current WEMP records (the 40 CFR 63, Subpart XXXXXX – Welding Emissions Management Plan (WEMP) permit condition) in accordance with the Monitoring and Recordkeeping general provision and 40 CFR 63.11519(c)(12), and it must be readily available for inspector review.

**Reporting**

**4.13 40 CFR 63, Subpart XXXXXX – Opacity Exceeding Reporting**

The permittee shall prepare an exceedance report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent, as required by 40 CFR 63.11516(f)(7)(i) (the 40 CFR 63, Subpart XXXXXX – Tier 3 Visible Emissions permit condition), in accordance with 40 CFR 63.11519(b)(8). This report shall be submitted along with the annual certification and compliance report according to the requirements in 40 CFR 63.11519(b)(1) (the 40 CFR 63, Subpart XXXXXX – Annual Certification and Compliance Reports permit condition), and shall contain the information in 40 CFR 63.11519(b)(8)(iii)(A) and (B):

- The date on which the exceedance occurred; and
- The average of the six-minute average opacities recorded during the visual determination of emissions opacity.

#### **4.14 40 CFR 63, Subpart XXXXXX – Opacity Reporting**

The annual certification and compliance report must contain the information specified in 40 CFR 63.11519(b)(6)(i) through (iii) for each affected source (as provided in Table 1.1 or otherwise determined) which performs visual determination of emissions opacity in accordance with 40 CFR 63.11517(c) (the 40 CFR 63, Subpart XXXXXX – Welding Rod Usage Recordkeeping permit condition), in accordance with 40 CFR 63.11519(b)(6);

- The date of every visual determination of emissions opacity;
- The average of the six-minute opacities measured by the test; and
- A description of any corrective action taken subsequent to the test.

#### **4.15 40 CFR 63, Subpart XXXXXX – WEMP Reporting**

The permittee shall submit a copy of the records of daily visual determinations of emissions recorded (the 40 CFR 63, Subpart XXXXXX – Tier 3 Visible Emissions permit condition) and a copy of the WEMP and any subsequent revisions to the WEMP (the 40 CFR 63, Subpart XXXXXX – Welding Emissions Management Plan (WEMP) permit condition), along with the annual certification and compliance report, in accordance with 40 CFR 63.11519(b)(1) and (9) (the 40 CFR 63, Subpart XXXXXX – Annual Certification and Compliance Reports permit condition).

# 5 Dry Abrasive Blasting

## 5.1 Process Description

Dry abrasive blasting is used to improve coating adhesion on equipment manufactured at the facility.

[10/22/2015]

## Operating Limits

### 5.2 Abrasive Blasting Usage Limits

The permittee shall limit operations in the Maintenance Shop Bead Blaster to the following:

- Hours of abrasive blasting operations shall be limited to below 1,822 hours per calendar year,
- Blasting abrasive usage shall be limited to below 202,250 pounds per calendar year.

### 5.3 Abrasive Blasting Media Specifications

The permittee shall use only grit, shot, or equivalent as a blasting abrasive (e.g., cast iron grit, cast iron shot, or steel shot in lieu of sand) in the Maintenance Shop Bead Blaster. “Or equivalent” blasting abrasive is defined as abrasive which has equivalent or lower pollutant emission rates (whether calculated based on maximum design capacity or based on established permit limits). Use of a replacement blasting abrasive shall not result in an emission increase as defined in IDAPA 58.01.01.007. Use of a replacement blasting abrasive shall not result in the emission of any regulated air pollutant not previously emitted. The number of bead blasters at the facility is not limited as long as the permittee can demonstrate equivalency to DEQ.

## Monitoring and Recordkeeping Requirements

### 5.4 Abrasive Blasting Usage Monitoring

Each calendar month that the Maintenance Shop Bead Blaster is operated, the permittee shall monitor and record the following to ensure compliance with the abrasive blasting usage limits (the Abrasive Blasting Usage Limits permit condition):

- The monthly and annual hours of abrasive blasting operations performed.
- The monthly and annual pounds of blasting abrasive used.

### 5.5 40 CFR 63, Subpart XXXXXX – Dry Abrasive Blasting

The permittee shall implement management practices to minimize emissions of MFHAP (as defined in the 40 CFR 63, Subpart XXXXXX – Definitions permit condition), in accordance with 40 CFR 63.11516(a)(3);

- Take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
- Enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material; and
- Operate all equipment associated with dry abrasive blasting operations according to manufacturer’s instructions; and
- Do not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and

- Whenever practicable, switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide).

#### **5.6 40 CFR 63, Subpart XXXXXX – Dry Abrasive Blasting Monitoring**

The permittee shall demonstrate that management practices are being implemented by complying with the requirements in 40 CFR 63.11516(a)(3)(ii) through (iv);

- Perform visual determinations of fugitive emissions, as specified in 40 CFR 63.11517(b) (the 40 CFR 63, Subpart XXXXXX – Fugitive Emission Determinations, Graduated Schedule permit condition), according to 40 CFR 63.11516(a)(3)(ii)(A) or (B), as applicable.
- Perform visual determinations of fugitive emissions at the fence line or property border nearest to the outdoor dry abrasive blasting operation.
- Perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.
- Keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in 40 CFR 63.11519(c)(2) (the 40 CFR 63, Subpart XXXXXX – Recordkeeping permit condition).
- If visible fugitive emissions are detected, corrective actions shall be performed until the visible fugitive emissions are eliminated, at which time compliance with 40 CFR 63.11516(a)(3)(iv)(A) and (B) shall be required.
- Perform a follow-up inspection for visible fugitive emissions in accordance with 40 CFR 63.11517(a) (the 40 CFR 63, Subpart XXXXXX – Fugitive Emission Determinations, General permit condition).
- Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for emissions, with the annual certification and compliance report as required by 40 CFR 63.11519(b)(5) (the 40 CFR 63, Subpart XXXXXX – Visual Determination of Fugitive Emissions Reporting permit condition).

## 6 Machining and Grinding

### 6.1 Process Description

Machining of steel is performed on a limited basis at the facility. Grinding work on steel is completed with angle grinders and both sanding disks and grinding wheels as required for preparing and finishing welds.

[10/22/2015]

### Operating Limits

#### 6.2 40 CFR 63, Subpart XXXXXX – Machining

The permittee shall implement management practices to minimize emissions of MFHAP (as defined in the 40 CFR 63, Subpart XXXXXX – Definitions permit condition) as specified in 40 CFR 63.11516(b)(1) and (2) for each machining operation that uses materials that contain MFHAP as defined in 40 CFR 63.11522, or has the potential to emit MFHAP, in accordance with 40 CFR 63.11516(b). These requirements do not apply when machining operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

- Take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and
- Operate all equipment associated with machining according to manufacturer's instructions.

#### 6.3 40 CFR 63, Subpart XXXXXX – Dry Grinding

For dry grinding machines, the permittee shall comply with the requirements of 40 CFR 63.11516(c)(1) and (2) for each dry grinding machines operation that uses materials that contain MFHAP as defined in 40 CFR 63.11522 (the 40 CFR 63, Subpart XXXXXX – Definitions permit condition), or has the potential to emit MFHAP, in accordance with 40 CFR 63.11516(c). These requirements do not apply when dry grinding operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

- Emissions shall be captured and vented to a filtration control device. Compliance with this requirement shall be demonstrated by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in 40 CFR 63.11519(c)(4) (the 40 CFR 63, Subpart XXXXXX – Recordkeeping permit condition).
- Management practices to minimize emissions of MFHAP as specified in 40 CFR 63.11519(c)(2)(i) and (ii).
  - Measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions shall be taken, as practical;
  - All equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, shall be operated according to manufacturer's instructions.

## 7 General Provisions

### General Compliance

- 7.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the “Rules for the Control of Air Pollution in Idaho.” The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the “Rules for the Control of Air Pollution in Idaho,” and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)

[Idaho Code §39-101, et seq.]

### Operation and Maintenance

#### 7.2 Operation and Maintenance

The permittee shall at all times (except as provided in the “Rules for the Control of Air Pollution in Idaho”) maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

- 7.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

### Inspection and Entry

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

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

[Idaho Code §39-108]

### Construction and Operation Notification

- 7.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

7.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

### Performance Testing

7.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

7.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

7.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

## **Monitoring and Recordkeeping**

### **7.10 Monitoring and Recordkeeping - General**

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

[IDAPA 58.01.01.211, 5/1/94]

## **Excess Emissions**

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

[IDAPA 58.01.01.130–136, 4/5/00]

## **Certification**

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

[IDAPA 58.01.01.123, 5/1/94]

## **False Statements**

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

[IDAPA 58.01.01.125, 3/23/98]

## **Tampering**

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

[IDAPA 58.01.01.126, 3/23/98]

## **Transferability**

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

[IDAPA 58.01.01.209.06, 4/11/06]

## **Severability**

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

**[IDAPA 58.01.01.211, 5/1/94]**

## APPENDIX A – SPRAY COATING MATERIALS

### **Primers**

- E2A933 3.5 VOC Epoxy Primer (grey)
- E2W932 3.5 VOC Epoxy Primer (off-white)
- E2W819 2.1 DTM Low VOC Urethane Primer
- E2W817 2.1 DTM Low VOC Urethane Primer (white)
- P30A 2K Urethane H.S. Color Primer Surfacer (white)
- DA667: Fisheye Eliminator

### **Colors, bases, and binders**

- Mixing Color GT1036 Chrome Yellow (lead-based)
- Mixing Color GT1039 Orange
- Mixing Color GT1043 Autumn Orange
- Mixing Color GT1047 Violet
- Mixing Color GT1048 Magenta
- Mixing Color GT1050 Lipstick Red
- Mixing Color GT1051 Royalty Rose
- Mixing Color GT1052 Cabernet
- Mixing Color GT1055 Small Metallic
- Mixing Color GT1061 LS Black
- Mixing Color GT1063 LS Pacific Blue
- Mixing Color GT1064 LS Violet
- Mixing Color GT1065 LS Red Oxide
- Mixing Color GT1011 Arctic White
- Mixing Color GT1013 Black Licorice
- Mixing Color GT1015 Plum Violet
- Mixing Color GT1017 Royal Blue
- Mixing Color GT1018 Pacific Blue
- Mixing Color GT1022 Sea Green
- Mixing Color GT1021 Emerald Green
- Mixing Color GT1025 Harvest Yellow

- Mixing Color GT1026 Pale Yellow
- Mixing Color GT1029 Golden Yellow
- Mixing Color GT1030 Autumn Yellow
- Mixing Color GT1033 Pumpkin

**Activators and accelerators**

- V6V943 Epoxy Primer Activator
- V66VB11 Polane Accelerator
- GA1098: 2.8/3.5 Super Accelerator

**Clears**

- GT1009 Mix Clear
- GT1010 Flat Mix Clear
- GT1530 Mixing Clear

**Solvents, thinners, and reducers**

- GR1073 Reducer, Warm Weather
- GR1086 Reducer, Hot Weather
- SR15: Speed Reducer
- R7K7210: Low VOC Reducer
- GR1087: HP Reducer
- GR1070: Reducer, Standard
- LX00097 Black Sure Foot
- VS-100 Fast VOC Solvent
- R7K156: Wax and Grease Remover
- BS10: 1k Urethane Blending Solvent (\*regular)
- BS10: 1k Urethane Blending Solvent (\*aerosol)
- Denatured Alcohol
- FT220: Finish 1 Economy Thinner

### **Hardeners, fillers, and liners**

- V6V810 2.1 DTM Low VOC Urethane Hardener (isocyanate-containing)
- V6V815 2.1 DTM Low VOC Urethane Hardener (isocyanate-containing)
- GH1096: 2.8 HP Hardener (isocyanate-containing)
- UH80: Low VOC Air Dry Hardener (isocyanate-containing)
- GH1093: 3.5 Low VOC Hardener (isocyanate-containing)
- GH1091: 3.5 VOC Hardener (isocyanate-containing)
- Shelcote Flake-Filled Epoxy A
- V6V837 2.1 DTM Low VOC Urethane Hardener
- GH1096 2.8 Hardener
- Shelcote Epoxy B Hardener
- G2 Feather Fill (Genesis M System) Yellow
- TRG 250 Truck Bed Liner Kit (\*black)
- DupliColor Truck Bed Armor, Black
- LX 00097 Black Sure Foot
- Turbo Liner 11 (MDI-Based)

[10/22/2015]