



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

February 8, 2018

Erick Click, Director of EHS
Lippert Components Inc - Twin Falls
427 Hankins Road South, Twin Falls, ID 83341

RE: Facility ID No. 083-00100, Lippert Components Inc - Twin Falls
Final Permit Letter

Dear Mr. Click:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2010.0144 Project 61958 to Lippert Components Inc - Twin Falls located at Twin Falls for the PTC modification to increase coating usage. 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 November 20, 2017 and on all relevant comments received on DEQ's proposed permit during the public comment period.

This permit is effective immediately and replaces PTC No. P-2010.0144, issued on September 21, 2012. This permit does not release Lippert Components Inc - Twin Falls 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 Twin Falls Regional Office, 650 Addison Avenue West, Suite 110, Twin Falls, 83301, Fax (208) 736-2194.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Air Quality and Remediation Manager, (208) 737-3889, 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 Tom Burnham at (208) 373-0502 or tom.burnham@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\tb
Permit No. P-2010.0144 PROJ 61958
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	Lippert Components Inc – Twin Falls
Permit Number	P-2010.0144
Project ID	61958
Facility ID	083-00100
Facility Location	427 Hankins Road South Twin Falls, Idaho, 83303

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 February 8, 2018



Tom Burnham, Permit Writer



Mike Simon, Stationary Source Manager

Contents

1	Permit Scope.....	3
2	Coating Operation	4
3	General Provisions.....	13

1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct to increase the daily usage rate of 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-2010.0144, issued on September 21, 2012.

Regulated Sources

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

Table 1.1 REGULATED SOURCES

Sources	Control Equipment
Paint Booth	Paint Booth Filters
Paint Booth Heaters	Paint Booth Filters
Building Heater	None
Welding	None

2 Coating Operation

2.1 Process Description

Lippert Components Inc. operates a trailer parts and frame manufacturing facility in Twin Falls. Trailer frame pieces are spray-coated with HAPs free coatings as determined from safety data sheets (SDS). All frames are made of steel and all coating activity is performed inside a filter controlled booth. The frames are coated with primer and topcoat coating mixtures. The paint booth has one exhaust stack.

2.2 Control Descriptions

Table 2.1 EMISSION UNIT DESCRIPTIONS

Emissions Units / Processes	Control Devices	Emission Points
<u>Paint Booth:</u> Manufacturer: VOC Containment Systems Model: AA-4 U VRC Air Flow Type: Side Draft Manufacture Date: October 2007 <u>Paint Sprayers:</u> Pressure pump system with HVLP spray guns with a transfer efficiency of 65%. <u>Paint Booth Heating</u> Two heaters with a rated heat input of 1.1 MM Btu/hr (Process Units) One heater with a rated heat input of 69,000 Btu/hr (Building Heating)	<u>Paint Booth Filtration System:</u> Manufacturer: Kem-Wove Model: SPS 1.0 Filters PM ₁₀ Control Efficiency: 99.4% 20 x 20, 1" thick – 46 total filters	Exhaust Point (Stack #1)
<u>Building Heating</u> One heater with a rated heat input of 69,000 Btu/hr	None	Building Vents
<u>Welding</u> Electric Arc Welding Rod: E70S Type: GMAW Wire usage: 3,000 lb/yr	None	Building Vents

[2/8/2018]

Emission Limits

2.3 Daily Coating Emission Limits

Emissions from all coating operations shall not exceed the emission rate limits in Table 2.2:

Table 2.2 Coating Operation Emission Limits ^(a)

Source Description	PM ₁₀ /PM _{2.5} ^(b)	VOC ^(c)
	lb/day ^(d)	lb/day ^(d)
Coating Operations	3.38	104.16

- In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- PM including condensable PM as defined in IDAPA 58.01.01.006, with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers for PM_{2.5}, and less than or equal to a nominal 10 micrometers for PM₁₀.
- Volatile organic compounds (VOC).
- Worst-case pounds of emissions from all coating operations per calendar day (combined), as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.

[2/8/2018]

2.4 Opacity Limit

Emissions from the Paint Booth stack, or any other stack, vent, or functionally equivalent opening associated with the coating operation, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

2.5 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.

Operating Requirements

2.6 Approved Daily Coating Usage Scenario

Unless the permittee is complying with an Alternate Daily Usage Scenario which demonstrates compliance with Coating Operation Emission Limits and Coating Operation Screening Emission Rates and Modeled Concentration Limits, the permittee shall comply with the daily coating material usage limits in Table 2.3.

Table 2.3 Approved Daily Usage Scenario

Coating Material	Daily Usage Limit (gal/day) ^(a)
Patriot 3-1540	46.4 ^(b)
Patriot 6-KMA-0210	
Sherwin Williams F75BC500	
Cloverdale Paint 792512	
Univar Glycol Ether	1.3

a) Gallons per calendar day

b) Aggregate total

[2/8/2018]

2.7 Annual Coating Usage Limits

The permittee shall not exceed the annual coating material usage limits in Table 2.4.

Table 2.4 Annual Usage Limits

Coating Material	Annual Usage Limit (gal/yr) ^(a)
Patriot 3-1540	17,000.0 ^(b)
Patriot 6-KMA-0210	
Sherwin Williams F75BC500	
Cloverdale Paint 792512	
Univar Glycol Ether	500.0

a) Gallons per rolling consecutive 12-calendar-month period

b) Aggregate total

[2/8/2018]

2.8 HHHHHH Exemption Letter

The permittee has applied for and received the EPA exemption from 40 CFR 63 Subpart HHHHHH - MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, General Compliance Requirements since the facility's initial PTC.

The permittee shall keep a copy of the exemption letter on site at all times and shall be made available to DEQ representatives upon request.

[9/21/2012]

2.9 Paint Booth Filter System

The permittee shall monitor and record visible emissions from the spray booth filter system once per day when operating (for any day a coating operation is performed in the paint spray booths) to demonstrate compliance with the opacity limit Permit Condition. The inspection shall consist of a see/no see evaluation for the paint spray booth exhaust system. If any visible emissions are present from the paint spray booth exhaust system, 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 opacity 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.

2.10 Filter System Procedures

The permittee shall have developed a Filter System Procedures document for the inspection and operation of the filter system which controls emissions from the paint booth filter system. The Filter System Procedures document shall be a permittee-developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Filter System Procedures document shall describe the procedures that will be followed to comply with the General Compliance General Provision and shall contain requirements for daily see-no-see visible emissions inspections of the filters. The inspection shall occur during daylight hours and under normal operating conditions.

The Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the filters at any time. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The Permittee shall maintain records of the results of each filter system inspections in accordance with the Recordkeeping General Provision. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The Filter System Procedures document shall be submitted to DEQ within 60 days of permit issuance for review and comment and shall contain a certification by a responsible official. Any

changes to the Filter System Procedures document shall be submitted within 15 days of the change.

The Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

2.11 Allowable Fuel Types

The space heaters shall only combust natural gas as fuel.

2.12 Prohibition From Using MeCl to Remove Paint

The permittee shall not use Methylene Chloride (MeCl) to remove paint at this facility.

2.13 Spray Gun and Spray Booth Filter System

- All painting at this facility, including application of primer, shall be conducted inside the booth with filters in place, fan(s) operating, and door(s) closed.
- All painting shall be conducted with a HVLP, electrostatic, airless or air assisted spray gun with a minimum 65% transfer efficiency as documented by the spray gun manufacturer.
- The permittee shall install, maintain, and operate according to the manufacturer's specifications and recommendations, a spray booth filter system with a minimum capture efficiency of no less than 99.4% for PM₁₀ emissions as documented by the filter manufacturer.

2.14 Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with 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.

Alternate Daily Coating Usage Scenarios

If the permittee proposes to use coating materials other than those listed in Table 2.3 (such as when new or reformulated coating materials are introduced), the permittee shall follow the procedures of this section. The permittee shall not use any Daily Coating Usage Scenario until coating TAP compliance and Coating Emission Limit compliance have been demonstrated for that Scenario according to the procedures below.

2.15 Propose a Daily Coating Usage Scenario

Prior to using or implementing a Daily Coating Usage Scenario:

- The permittee shall propose and record maximum daily coating usage limits for each coating material that will be used in the Scenario, in gallons per day (gal/day). The permittee shall not use or implement any Scenario that does not have recorded maximum daily coating usage limits.
- The permittee shall estimate emissions of PM₁₀/PM_{2.5}, VOC, individual HAP, total HAP, and all TAP listed in Table 2.5 for the Scenario (lb/day for each pollutant), using the procedures described below for estimating emissions.

- The permittee shall demonstrate coating TAP compliance for the Scenario, using the procedures described below for demonstrating coating TAP compliance. The permittee shall not use or implement any Scenario that does not demonstrate coating TAP compliance.
- The permittee shall demonstrate Coating Emission Limit compliance for the Scenario, using the procedures described below for demonstrating Coating Emission Limit compliance. The permittee shall not use or implement any Scenario that does not demonstrate Coating Emission Limit compliance.
- The daily coating usage limits and emission estimates used in determining coating TAP compliance and Coating Emission Limit compliance shall be based on estimated emissions from all coatings to be used from all coating operations at the facility (i.e., facility-wide).

[2/8/2018]

2.16 Estimate Coating TAP Emissions

TAP emissions shall be estimated for all TAP listed in Table 2.5:

- Emissions shall be estimated by multiplying each maximum daily coating usage rate (gal/day) by the TAP content (lb/gal) of that coating, and summing the total emissions from all coating materials (lb/day). TAP emissions which are designated as a particulate in Table 2.5 may also be multiplied by one minus the documented spray gun transfer efficiency and by one minus the documented filtration system control efficiency when control equipment will be applied to such emissions.
- TAP content (lb/gal) of a coating is specified on the Safety Data Sheet (SDS) for that coating, or shall be calculated by multiplying the weight percentage of TAP (%) by the density (lb/gal) of the coating from the SDS.
- For TAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the TAP content is listed as below detection on SDS or other documentation, the TAP content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.
- When the TAP content cannot be determined from SDS or other documentation, the TAP content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.

[2/8/2018]

2.17 Demonstrate Coating TAP Compliance

For each Daily Coating Usage Scenario, the permittee shall estimate TAP emissions and compare against the TAP Screening Emission Rates or Modeled Concentration Limits in Table 2.2:

- The permittee shall compare estimated TAP emissions for all coatings against the Screening Emission Rates in Table 2.5. For emissions equal or less than the Screening Emission Rate, modeling analyses is not required. For emissions in excess of the Screening Emission Rate, modeling analyses is required to determine the maximum modeled concentration.
- Modeled emissions from all coating operations for a Daily Coating Usage Scenario shall not exceed the Modeled Concentration Limits in Table 2.5. The permittee shall not use or implement any Scenario that exceeds a Modeled Concentration Limit.
- All modeling analyses shall use EPA-approved models and follow relevant guidance in the most recent version of the “State of Idaho Guideline for Performing Air Quality Impact Analyses,” available for download at DEQ’s website.

Table 2.5 TAP Screening Emission Rates and Modeled Concentration Limits

TAP	CAS	Particulate?	Screening Emission Rate (lb/day) ^(a)	Modeled Concentration Limit (mg/m ³)
Acetone	67-64-1	No	2856	89
Acrylamide	79-06-1	No	0.0001224	0.00000077
Aluminum - Metal and Oxide	7429-90-5	Yes	16.008	0.5
Aluminum - Soluble Salts	7429-90-5	Yes	3.192	0.1
n-Amyl Acetate	628-63-7	No	847.2	26.5
Antimony & Compounds, as Sb	7440-36-0	Yes	0.792	0.025
Barium (Soluble Compounds), as Ba	7440-39-3	Yes	0.792	0.025
Benzene	71-43-2	No	0.0192	1.20E-04
Benzoyl peroxide	94-36-0	No	7.992	0.25
Bis (2-Ethylhexyl) Phthalate (DEHP)	117-81-7	No	0.672	0.0042
2-Butoxyethanol	111-76-2	No	192	6
2-Butoxyethyl Acetate	112-07-2	No	199.92	1.25
n-Butyl Acetate	123-86-4	No	1135.2	35.5
n-Butyl Alcohol	71-36-3	No	240	7.5
Calcium Carbonate	1317-65-3	Yes	16.008	0.5
Carbon Black	1333-86-4	Yes	5.52	0.175
Carbon Tetrachloride	56-23-5	No	0.01056	0.067
Chromium Metal, Chromium (III) Compounds as Cr	7440-47-3, 16065-83-1	Yes	0.792	0.025
Cumene	98-82-8	No	391.2	12.25
Cyclohexane	110-82-7	No	1680	52.5
Cyclohexanone	108-94-1	No	160.08	5
Diacetone Alcohol	123-42-2	No	384	12
Dibutyl Phthalate	84-74-2	No	7.992	0.25
1,4-Dichlorobenzene	106-46-7	No	720	22.5
o-Dichlorobenzene	95-50-1	No	480	15
Diethyl Phthalate	84-66-2	No	7.992	0.25
Diisobutyl Ketone	108-83-8	No	232.08	7.25
Dimethylphthalate	131-11-3	No	7.992	0.25
Dipropylene Glycol Methyl Ether	34590-94-8	No	960	30
2,6-Di- <i>tert</i> -butyl-p-cresol (butylated hydroxytoluene)	128-37-0	No	16.008	0.5
Ethyl Acetate	141-78-6	No	2239.2	70
Ethyl Alcohol	64-17-5	No	3000	94
Ethyl Benzene	100-41-4	No	696	21.75
Ethylene Glycol Vapor	107-21-1	No	20.304	6.35
Formaldehyde	50-00-0	No	0.01224	7.70E-05

Heptane (n-Heptane)	142-82-5	No	2616	82
Hexamethylene Diisocyanate	822-06-0	No	0.048	0.0015
Hexane (n-Hexane)	110-54-3	No	288	9
Hydroquinone	123-31-9	No	3.192	0.1
Iron Oxide Fume (Fe ₂ O ₃) as Fe	1309-37-1	Yes	7.992	0.25
Isobutyl Acetate	110-19-0	No	1120.8	35
Isobutyl Alcohol	78-83-1	No	240	6
Isophorone Diisocyanate	4098-71-9	No	0.144	0.0045
Isopropyl Alcohol	67-63-0	No	1567.2	49
Isopropyl Acetate	108-21-4	No	1663.2	52
Kaolin	1332-58-7	Yes	3.192	0.1
Manganese as Mn, Dust & Compounds	7439-96-5	Yes	7.992	0.25
Magnesite	546-93-0	Yes	16.008	0.5
Methacrylic Acid	79-41-4	No	112.08	3.5
Methanol	67-56-1	No	415.2	13
1-Methoxy-2-Propanol Acetate	108-65-6	No	576	3.6
2-Methoxyethyl Acetate	110-49-6	No	38.4	1.2
Methyl Acetate	79-20-9	No	976.8	30.5
Methyl n-Amyl Ketone	110-43-0	No	376.8	11.75
Methyl Chloroform	71-55-6	No	3048	95.5
Methyl Ethyl Ketone (MEK)	78-93-3	No	943.2	29.5
Methyl Isoamyl Ketone	110-12-3	No	384	12
Methyl Isobutyl Carbinol	108-11-2	No	166.32	5.2
Methyl Isobutyl Ketone (MIBK)	108-10-1	No	328.8	10.25
Methyl Methacrylate	80-62-6	No	655.2	20.5
Methylene Chloride	75-09-2	No	0.0384	2.40E-04
Methylene Diisocyanate (MDI)	101-68-8	No	0.072	0.0025
Methyl Propyl Ketone	107-87-9	No	1120.8	35
Mica (Respirable Dust)	12001-26-2	Yes	4.8	0.15
Molybdenum as Mo	7439-98-7	Yes	7.992	0.25
Naphthalene	91-20-3	No	79.92	2.5
Nickel	7440-02-0	Yes	0.000648	4.20E-06
Nonane	111-84-2	No	1680	52.5
Pentane	109-66-0	No	2832	88.5
Phenol	108-95-2	No	30.48	0.95
Phosphoric Acid	7664-38-2	No	1.608	0.05
Propionic Acid	79-09-4	No	48	1.5
n-Propyl Acetate	109-60-4	No	1344	42
Propyl Alcohol	71-23-8	No	799.2	25
Selenium	7782-49-2	Yes	0.312	0.01

Silica – Amorphous, including: • Diatomaceous Earth (uncalcined) • Precipitated Silica • Silica Gel	61790-53-2 112926-00-8	Yes	16.008	0.5
Silica - Crystalline - Cristobalite	14464-46-1	Yes	0.0792	0.0025
Silica - Crystalline Quartz & Fused Silica	14808-60-7	Yes	0.1608	0.005
Stoddard Solvent	8052-41-3	No	840	26.25
Styrene	100-42-5	No	160.08	1
Tetrahydrofuran	109-99-9	No	943.2	29.5
Toluene	108-88-3	No	600	18.75
Triethylamine	121-44-8	No	6.48	0.2
Trimethyl Benzene (Mixed and Individual Isomers)	25551-13-7	No	196.8	6.15
Vinyl Acetate	108-05-4	No	55.2	1.75
VM&P Naphtha	8032-32-4	No	2191.2	68.5
Xylene (o-, m-, p-isomers)	1330-20-7	No	696	21.75
Zinc	7440-66-6	Yes	16.008	0.5
Zinc Oxide Dust	1314-13-2	Yes	16.008	0.5

a) Worst-case pounds of emissions from all coating operations (combined) per day, as calculated using procedures in this permit to estimate TAP emissions, or as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.

b) Milligrams of toxic air pollutant (TAP) per cubic meter, modeling proposed emission rates calculated using a daily averaging period.

[2/8/2018]

2.18 Demonstrate Coating Emission Limit Compliance

For each Daily Coating Usage Scenario, emissions from all coating operations shall be estimated and compared against the Coating Emission Limits in Table 2.2:

- PM₁₀/PM_{2.5} emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the solids content (lb/gal) of that coating, and summing the total emissions from all coatings (lb/day). Emissions may also be multiplied by one minus the transfer efficiency and by one minus the filter control efficiency when control equipment will be applied to such emissions.
- VOC emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the VOC content (lb/gal) for that coating material, and summing the total emissions from all coating materials (lb/day).
- HAP emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the HAP content (lb/gal) for each coating material, and summing the total emissions from all coating materials (lb/day).
- For solids content, VOC content, and HAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the solids content, VOC content, or HAP content is listed as below detection on SDS or other documentation, the HAP content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.
- When the solids content, VOC content, or HAP content cannot be determined from SDS or other documentation, the content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.

- The permittee shall compare estimated emissions for all coating materials against the Coating Emission Limits in Table 2.2. The permittee shall not use or implement any Scenario that exceeds a Coating Emission Limit.

[2/8/2018]

Monitoring, Recordkeeping, and Reporting Requirements

2.19 Coating Usage Scenario Monitoring

Each calendar day on which coating materials are used, the permittee shall select and record the Daily Coating Usage Scenario that will be used for that day, and comply with the maximum daily coating usage limits specified for the selected Scenario.

- Only one Daily Coating Usage Scenario may be used each calendar day.
- The permittee shall not exceed any daily coating usage limit for the Scenario chosen that calendar day.
- The permittee shall maintain documentation such as coating material SDS, manufacturer's specification sheets that support filter control efficiencies, transfer efficiencies, capture efficiencies, and other engineering assumptions relied upon in emission calculations.

[2/8/2018]

2.20 Coating Material Usage Recordkeeping

Each calendar day on which coating materials are used, the permittee shall collect and maintain records of the quantity of each material used, including but not limited to thinner, reducer, primer, top coat, clear coat, enamel, activator, retarder, accelerator, and hardener to demonstrate compliance with Approved or Alternate Daily Coating Usage Limits.

[2/8/2018]

2.21 Coating Material Purchase and Safety Data Sheet Recordkeeping

For each coating material used at the facility, including but not limited to thinner, reducer, primer, top coat, clear coat, enamel, activator, retarder, accelerator, and hardener the permittee shall record and maintain the following records:

- Material purchase records
- Safety Data Sheets (SDS)

[2/8/2018]

2.22 Coating Usage Scenario Reporting

Each year, the permittee shall submit a report by May 1st on all Daily Coating Usage Scenarios used each calendar day during the previous 365-day period. The report shall include documentation supporting the TAP compliance demonstrations and the Coating Emission Limit compliance demonstrations relied upon for each Daily Coating Usage Scenario, and any modeling analyses conducted in each coating TAP compliance demonstration. Documentation should be in sufficient detail, including documentation of all calculations and electronic copies of modeling files, such that DEQ can verify the analysis. The report shall be titled "Permit-Required TAP Compliance Report" and shall be sent to:

DEQ State Office
Air Quality Division
1410 N. Hilton
Boise, ID 83706

[2/8/2018]

3 General Provisions

General Compliance

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

[Idaho Code §39-101, et seq.]

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

[IDAPA 58.01.01.211, 5/1/94]

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

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

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

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

[Idaho Code §39-108]

Construction and Operation Notification

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

[IDAPA 58.01.01.211.02, 5/1/94]

3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- 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.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7** If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 3.8** All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 3.9** Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

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

Monitoring and Recordkeeping

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

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

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

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

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

[IDAPA 58.01.01.123, 5/1/94]

False Statements

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

[IDAPA 58.01.01.125, 3/23/98]

Tampering

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

[IDAPA 58.01.01.126, 3/23/98]

Transferability

- 3.15** This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

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

[IDAPA 58.01.01.211, 5/1/94]