



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

C.L. "Butch" Otter, Governor
Curt Fransen, Director

December 22, 2014

Ron Scott, Human Resource Manager
Double L
307 Warm Springs Way
Heyburn, Idaho 83336

RE: Facility ID No. 067-00042, Double L, Heyburn
Final Permit Letter

Dear Mr. Scott:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2013.0058 Project 61300 to Double L located at Heyburn for an existing farm machinery and harvesting manufacturing facility. 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 on December 4, 2013, and supplemental information provided on January 9, 2014 and March 19, 2014.

This permit is effective immediately. This permit does not release Double L from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Air Quality & Remediation Manager, at (208) 736-2190 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 Harbi Elshafei at (208) 373-0502 or harbi.elshafei@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\HE

Permit No. P-2013.0058 PROJ 61300

Enclosures

AIR QUALITY

PERMIT TO CONSTRUCT

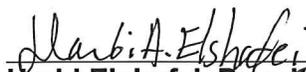
Permittee Double L
Permit Number P-2013.0058
Project ID 61300
Facility ID 067-00042
Facility Location 307 Warm Springs Way
Heyburn, Idaho 83336

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

December 22, 2014



Harbi Elshafei, Permit Writer



Mike Simon, Stationary Source Manager

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1. Permit Scope

Purpose

1.1 This is the initial permit to construct (PTC) for an existing farm machinery and harvesting manufacturing facility.

Regulated Sources

1.2 The emission sources regulated by this permit are listed in the following table.

Table 1.1 Regulated sources.

Permit Section	Source	Control Equipment
2	<u>Facility-Wide Conditions</u>	None
3	<u>Spray Paint Booth</u> Manufacturer: Sprayline Manufacturing Company Model: SL-SDD-264417 w/ MR-6168 or equivalent Size: 26 ft wide x 44 ft long x 16 ft high Booth type: Sprayline Semi-Down Draft Manufacture Date: 2012 <u>Coating Spray Gun</u> Number of guns to be used simultaneously: one Manufacturer: Graco or equivalent Model: Graco 395 Ultra Electric; Graco FTx Contractor Model 238350 Series A or equivalent Gun type: Airless Transfer efficiency: 65% or greater Rated capacity: 0.31 gallons (gal)/min or 18.6 gal/hr	Filter system with PM control efficiency of 98% (minimum)
4	<u>Abrasive Blasting Booth (fully enclosed)</u> Manufacturer: Sprayline Manufacturing Company Manufacture date: 2012 Model: SL BR 264415-DT Size: 22 ft wide x 78 ft long x 17 ft high Media used: Recyclable steel grit	Two EnviroSystems AW160HD Air Wall Filtration Units on each side of the booth. Control efficiency: PM _{0.5} = 98.8% PM _{1.0} = 99.9% PM _{2.0} = 100% Filter Cartridge Specifications: 60-01-05 and 60-01-06
4	<u>Grinding</u> Hand-held grinders Maximum grinding usage: 10 wheels/hr (approx. 10 lbs/hr)	Clark Air Rotation Systems
4	<u>Welding</u> Type of welding: Gas Metal Arc Welding (GMAC) (Also known as Metal Inert gas Welding (MIG) Product name: ProStar S6, or equivalent	4 Clark Air Rotation Systems with filtered air recirculated into the welding bay area
4	<u>15 natural gas-fired heaters</u> Three Reznor UDAS space heaters, combined heat input rating 600,000 Btu/hr Eight Carrier Furnaces, combined heat input rating 900,000 Btu/hr Three Thermo-Cycler, air handling units, combined heat input rating 1,650,000 Btu/hr One Bananza Model B4000, paint booth heater, heat input rating 5,130,000 Btu/hr	None

2. Facility-Wide Conditions

Fugitive Emissions

- 2.1 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 practices, where practical:
- 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.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving a valid complaint. The records shall include, at a minimum, the date that 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.
- 2.4 The permittee shall conduct a quarterly 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. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. 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.

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that 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. A compilation of the most recent five

years of records shall be kept on site and shall be made available to DEQ representatives upon

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:
- a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).
 - or
 - b) 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%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.
- 2.9 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.

Open Burning

- 2.10 The permittee shall comply with the "Rules for Control of Open Burning" (IDAPA 58.01.01.600–623).

Reports and Certifications

- 2.11 In accordance with IDAPA 58.01.01.123, any reporting required by this permit—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications—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. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office
650 Addison Avenue West, Suite 110
Twin Falls, ID 83301

Phone: (208) 736-2190
Fax: (208) 736-2194

Fuel-Burning Equipment

2.12 In accordance with IDAPA 58.01.01.676-677, the permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas and 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid.

Material Purchase Records and Material Data Safety Sheets

2.13 For each material used in painting, welding, grinding, and abrasive blasting operations, the permittee shall record and maintain the following records:

- Material purchase records
- Material Safety Data Sheets (MSDS)

Obligation to Comply and New TAP or HAP

2.14 Receiving a PTC shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations. The permittee shall document compliance with the Rules when using new materials containing new toxic air pollutants (TAP) or hazardous air pollutants (HAP).

3. Painting Operations and 40 CFR 63 Subpart HHHHHH

3.1 Process Description

Double L designs and repairs farm machinery and harvesting equipment. The manufacturing process involves painting of equipment, welding and intermittent hand grinding and the use of abrasive media to prepare metals for painting.

The painting process at the facility utilizes an enclosed Spray-Line Semi-Down Draft 264417 spray booth. The paint booth is located in the west wing of the building. The booth is equipped with a 5.1 MMBTU/hr natural gas-fired burner to heat the paint booth. Drying and paint curing is done in the paint booth. Paint is transferred via a Graco 395 Ultra Electric Airless Sprayer to Graco FTx Contractor Model 238350 Series A spray gun (or equivalent). The spray gun has a transfer efficiency of 65%. Particulate emissions from painting are vented through two exhaust stacks.

The abrasive blasting, welding, grinding, and the natural gas heater processes existing at the facility are addressed in section 4 of this permit.

3.2 Control Device Descriptions

The paint spray booth utilizes fiberglass filtration media for control of PM₁₀ emissions from the booth coating operation with capture efficiency of 98%. In addition, airless paint guns (or equivalent) are used to minimize PM₁₀ and VOC emissions from painting. The airless spray guns (or equivalent) spray equipment will control PM₁₀ and VOC emissions by having more paint transfer to the desired surfaces than traditional painting equipment.

Table 3.1 PAINT BOOTH DESCRIPTION

Emissions Units / Processes	Control Devices	Emission Points
Paint booth	Paint spray booth filter system Airless sprayer gun (or equivalent)	Paint booth two exhaust stacks

Emission Limits

3.3 Emission Limits

The PM_{2.5}/PM₁₀ and VOC emissions from the paint booth(s) stack shall not exceed any emissions rate limit in the following table.

Table 3.2 PAINT BOOTH EMISSION LIMITS^a

Source Description	PM _{2.5} /PM ₁₀ ^b		VOC	
	lb/hr ^c	T/yr ^d	lb/hr ^c	T/yr ^d
Paint booth and paint booth heater	0.15	0.23	15.4	23.1

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal five (5) or 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.
- d) Tons per any consecutive 12-calendar month period

Operating Requirements

3.4 Permitted Fuel

To demonstrate compliance with the Emissions Limits permit condition the paint booth heater shall only combust natural gas as fuel.

3.5 Prohibition From Using MeCl to Remove Paint

The permittee shall not use Methylene Chloride (MeCl) (CAS #75-09-0) to remove paint at this facility.

3.6 Sherwin-Williams and Sunnyside Corp Coatings Materials Use Limit

The Sherwin-Williams and Sunnyside Corp coatings (as listed below) use in the paint booth shall not exceed 93.00 gallons per calendar day.

- Sherwin-Williams *K119-SW* paint (R7K119 Lacquer Thinner) or equivalent,
- Sherwin-Williams *F75RV2* paint (Silicone ALKYD DTM Enamel, Flame Red) or equivalent,
- Sherwin-Williams *E61A00705* paint (KEM Flash Ultrabond Gray) or equivalent,
- Sherwin-Williams *F75BV2* paint (Silicone ALKYD DTM Enamel, Black Hi-Bild or equivalent,
- Sherwin-Williams *F75WV1* paint (Silicone ALKYD DTM Enamel, white or equivalent,
- Sherwin-Williams *F75YV0001* paint (Silicon ALKYD DTM Enamel -EQUI, Yellow) or equivalent, and
- Sunnyside Corp *Solvent 100 paint* (Petroleum Solvent 100) or equivalent,

For the purposes of this permit condition, “or equivalent” is defined as:

- a solid and volatile organic compounds (VOC) content of a new paint material, in lb/gal, as listed in the SDS, formerly known as MSDS, is equal to or less than the solid and VOC content, as listed in the SDS, of the corresponding paint material listed in this permit condition, and
- a wt% of metals, HAP, and TAP multiplying the paint density, in lb/gal, as listed in the SDS, of a new paint material, is equal to or less than the wt% of metals, HAP, and TAP multiplying the paint density, in lb/gal, as listed in the SDS, of the corresponding paint material listed in this permit condition. Use of any paint material with new TAP or HAP are not allowed under this permit condition. New TAP or HAP emissions must be evaluated in accordance with Permit Condition 2.14.

3.7 Spray Gun and Spray Booth(s) Filter System

- All painting at the facility, including application of primer, shall be conducted inside the paint booth with filter system in place, exhaust fan(s) operating, and door(s) or curtain(s) closed. For complete farm machinery or mobile equipment the paint booth must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or side curtains.
- All painting shall be conducted with an airless spray gun, or equivalent technology, 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 or a preparation station filter system with a minimum control efficiency of 98% for PM₁₀ emissions as documented by the filter manufacturer.

Monitoring and Recordkeeping Requirements

3.8 Material Purchase Records and Material Data Safety Sheet

For each material used in the paint booth coating process, including but not limited to painting, thinners, primers, Black Hi Bild, white, flame red, and yellow enamels, and solvents, the permittee shall record and maintain the following records:

- Material purchase records
- Material Safety Data Sheets (MSDS)

3.9 Coating Materials Usage Recordkeeping

When the painting process is in operation, the permittee shall collect and maintain records of the following information to demonstrate compliance with the Sherwin-Williams and Sunnyside Corp Coatings Materials Use Limit permit condition:

- On a calendar day basis, the quantity in gallons and manufacturer of each material used in the paint booth coating process, including but not limited to paintings, thinners, primers, enamels, and solvents.

3.10 Recordkeeping

The permittee shall comply with the recordkeeping General Provision requirements.

3.11 Filter System Procedures

Within 60 days of the permit issuance or by a DEQ-approved alternate date, the permittee shall have developed a Baghouse/Filter System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from painting operations. The Baghouse/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 Baghouse/Filter System Procedures document shall describe the procedures that will be followed to comply with General Provision 2 and shall contain requirements for monthly see-no-see visible emissions inspections of the baghouse/filter system. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse/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 baghouse/filter system at anytime. 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 baghouse/filter system inspections in accordance with General Provision 10. The records shall include, but not be limited to, the following:

- Date and time of inspection;
- Equipment inspected (e.g. exterior housing of baghouse, fan motor, inlet air ducting);
- Description of whether visible emissions were present, and if visible emissions were present a description of the corrective action that was taken.
- Date corrective action was taken.

The Baghouse/Filter System Procedures document shall be submitted to DEQ for review within 60 days of the permit issuance or by a DEQ-approved alternate date and shall contain a

certification by a responsible official. Any changes to the Baghouse/Filter System Procedures document shall be submitted within 15 days of the change.

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

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

40 CFR 63, Subpart HHHHHH Requirements (If Applicable)

3.12 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, General Compliance Requirements

Unless an exemption from the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2), in accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of this facility the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH

- The permittee shall meet the requirements of 40 CFR 63.11173(e)(1). All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in 40 CFR 63.11173(f). The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in 40 CFR 63.11173(f).
- All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of 40 CFR 63.11173(e)(2).
 - All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98% capture of paint overspray. 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.
 - Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.
 - Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.
- All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, or air-assisted airless spray gun, in accordance with 40 CFR 63.11173(e)(3).

- All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent, in accordance with 40 CFR 63.11173(e)(4). Spray gun cleaning may be done by using a fully enclosed spray gun washer.
- Each owner or operator must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, are trained in the proper application of surface coatings as required by 40 CFR 63.11173(e)(1), in accordance with 40 CFR 63.11173(f). The training program must include, at a minimum:
 - A list of all current personnel by name and job description who are required to be trained;
 - Hands-on and 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 coating 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 coatings to improve transfer efficiency and minimize coating 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; and environmental compliance with the requirements of 40 CFR 63, Subpart HHHHHH.
- 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. 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 are not required to provide the initial training to these painters.
- All new and existing personnel at the facility, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, must be trained by the dates specified in 40 CFR 63.11173(g). Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.
 - All personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in 40 CFR 63.11173(f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
 - Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.
- The parts of the General Provisions which apply to the permittee are specified in Table 4, in accordance with 40 CFR 63.11174(a).

Table 1 APPLICABILITY OF GENERAL PROVISIONS TO SUBPART HHHHHH OF PART 63

Citation	Subject	Explanation
40 CFR 63.1(a)(1)-(12)	General Applicability	
40 CFR 63.1(b)(1)-(3)	Initial Applicability Determination	Applicability of subpart HHHHHH is also specified in 40 CFR 63.11170.
40 CFR 63.1(c)(1)	Applicability After Standard Established	
40 CFR 63.1(c)(2)	Applicability of Permit Program for Area Sources	
40 CFR 63.1(c)(5)	Notifications	
40 CFR 63.2	Definitions	Additional definitions are specified in 40 CFR 63.11180.
40 CFR 63.3(a)-(c)	Units and Abbreviations	
40 CFR 63.4(a)(1)-(5)	Prohibited Activities	
40 CFR 63.4(b)-(c)	Circumvention/Fragmentation	
40 CFR 63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	
40 CFR 63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	40 CFR 63.11172 specifies the compliance dates.
40 CFR 63.6(c)(1)-(5)	Compliance Dates for Existing Sources	40 CFR 63.11172 specifies the compliance dates.
40 CFR 63.6(e)(1)-(2)	Operation and Maintenance	
40 CFR 63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	
40 CFR 63.6(f)(2)-(3)	Methods for Determining Compliance	
40 CFR 63.6(g)(1)-(3)	Use of an Alternative Standard	
40 CFR 63.6(i)(1)-(16)	Extension of Compliance	
40 CFR 63.6(j)	Presidential Compliance Exemption	
40 CFR 63.9(a)-(d)	Notification Requirements	40 CFR 63.11175 specifies notification requirements.
40 CFR 63.9(i)	Adjustment of Submittal Deadlines	
40 CFR 63.9(j)	Change in Previous Information	40 CFR 63.11176(a) specifies the dates for submitting the notification of changes report.
40 CFR 63.10(a)	Recordkeeping/Reporting—Applicability and General Information	
40 CFR 63.10(b)(1)	General Recordkeeping Requirements	Additional requirements are specified in 40 CFR 63.11177.
40 CFR 63.10(b)(2)(xii)	Waiver of recordkeeping requirements	
40 CFR 63.10(b)(2)(xiv)	Records supporting notifications	
40 CFR 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	
40 CFR 63.10(d)(1)	General Reporting Requirements	Additional requirements are specified in 40 CFR 63.11176.
40 CFR 63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	
40 CFR 63.10(f)	Recordkeeping/Reporting Waiver	
40 CFR 63.12	State Authority and Delegations	
40 CFR 63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Incorporation by Reference	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in 40 CFR 63.11173(e)(2) and (3) are incorporated and included in 40 CFR 63.14.
40 CFR 63.15	Availability of Information/Confidentiality	
40 CFR 63.16(a)	Performance Track Provisions—reduced reporting	

3.13 **40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Recordkeeping**

Unless an exemption from the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2), in accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of this facility the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- The permittee shall keep the following records in accordance with 40 CFR 63.11177(a) through (d) and (h).
 - Certification that each painter has completed the training specified in 40 CFR 63.11173(f) with the date the initial training and the most recent refresher training was completed.
 - Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in 40 CFR 63.11173(e)(2).
 - Copies of any notification submitted as required by 40 CFR 63.11175 and copies of any report submitted as required by 40 CFR 63.11176.
 - Records of any deviation from the requirements in 40 CFR 63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
 - Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.
- The permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record in accordance with 40 CFR 63.11178(a). Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.
- In accordance with 40 CFR 63.11178(a), the permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

3.14 **40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Notifications**

Unless an exemption from the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2), in accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of this facility the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- *Initial Notification.* The permittee must submit the initial notification required by 40 CFR 63.9(b) in accordance with 40 CFR 63.11175(a). For this new source, the permittee must submit the Initial Notification no later than 180 days after initial startup. The initial notification must provide the following information.

- The company name, if applicable;
 - The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;
 - The street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - An identification of the relevant standard, such as 40 CFR part 63, Subpart HHHHHH;
 - A brief description of the type of operation. For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.
 - A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date.
 - The permittee must certify in the initial notification whether the source is in compliance with each of the requirements of 40 CFR 63, Subpart HHHHHH. If the permittee is certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.
- *Notification of Compliance Status.* The permittee is not required to submit a separate notification of compliance status in addition to the initial notification provided the permittee was able to certify compliance on the date of the initial notification as part of the initial notification, and the permittee's compliance status has not since changed in accordance with 40 CFR 63.11175(b). The permittee must submit a Notification of Compliance Status within 180 days after startup. The permittee is required to submit the following information with the Notification of Compliance Status:
 - The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, 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 or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For surface coating operations, the relevant requirements are specified in 40 CFR 63.11173(e) through (g).
 - The date of the Notification of Compliance Status.

3.15 **40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Reports**

Unless an exemption from the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2), in accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of this facility the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- Annual Notification of Changes Report. In accordance with 40 CFR 63.11176, the permittee is required to submit a report in each calendar year in which information previously submitted in either the initial notification required by 40 CFR 63.11175(a), Notification of Compliance, or a previous annual notification of changes report submitted has changed. Deviations from the relevant requirements in 40 CFR 63.11173(a) through (d) or 40 CFR 63.11173(e) through (g) on the date of the report will be deemed to be a change. The annual notification of changes report must be submitted prior to March 1 of each calendar year when reportable changes have occurred and must include the following information.
 - The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, 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 or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance.
- Any notifications or reporting required by the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH or Subpart A – General Provisions shall be submitted to both of the following addresses in accordance with 40 CFR 63.13:

EPA Region 10
 Manager, Federal and Delegated Air Programs Unit
 Office of Air, Waste, and Toxics
 1200 Sixth Avenue, Suite 900
 (AWT-107)
 Seattle, WA 98101

And,

Air Quality Permit Compliance
 Department of Environmental Quality
 Twin Falls Regional Office
 650 Addison Avenue West, Suite 110
 Twin Falls, ID 83301

Phone: (208) 736-2190
 Fax: (208) 736-2194

3.16 Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- National Emission Standards for Hazardous Air Pollutants (NESHAP) Area Sources, 40 CFR Part 63, Subpart HHHHHH.

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 to that regulation.

4. Abrasive Blast Booth, Welding, Grinding, and Heaters

4.1 Process Description

The permittee uses a fully enclosed Sprayline SL-BR-264415-DT Blast Booth with recyclable steel shot media to prepare metals for painting. To automate the media recovery and cleaning process, the facility utilizes a Clemco Industries Belt Conveyor and Abrasive Recovery System which is inside the blast booth. No emissions are expected to leave the blast booth building.

The welding is conducted inside the North Bay of the facility. The permittee uses Gas Metal Arc Welding (GMAC), also known as Metal Inert Gas Welding (MIG) to repair equipment. The permittee uses ProStar S6-ER70S-6 welding wire, or equivalent. Welding activities generate fugitive emissions which are not vented to any exhaust stacks. Welding emissions are captured, filtered and are re-circulated back into the welding bay area.

The facility also uses hand-held grinders to prepare metals for painting. Grinding is intermittent and is conducted in the middle of the welding bay. Particles from grinding are settled on the floor near the grinding machines. Once grinding has stopped, particles are vacuumed up and are disposed of. Particles that are not settled on the floor are captured by the filtration system

There are 15 natural gas-fired heaters existing at the facility with a combined rated heat input rating of 8.3 MMBtu/hr.

4.2 Control Device Descriptions

Table 4.1. Abrasive Blast Booth, Welding, Grinding, and Heaters Description.

Emissions Units / Processes	Control Devices	Emission Points
<u>Abrasive blast booth (fully enclosed)</u>	Two EnviroSystems Industrial Dust Collector Air Wall Filtration units. During blasting, particulate emissions are captured and filtered through the industrial dust collector air wall filtration units and filtered air is then recycled back into adjacent work area	None
<u>Welding</u> Gas metal arc welding (GMAC)	4 Clark Air Rotation Systems with filtered air recirculated into the welding bay area	Venting inside building
<u>Hand-grinding</u>	Clark Air Rotation Systems	Venting inside building
<u>15 natural gas- fired heaters</u>	None	Various

Operating Requirements

4.3 Welding Wire and Grinding Wheels/Grinding Discs Usage

- The welding wire usage of ProStar S6-ER70S-6 or equivalent shall not exceed 110 pounds per day and 28,072 pounds per any consecutive 12-month period.
- The grinding wheels and grinding discs of Resinoid Bonded Abrasives or equivalent shall not exceed 100 pounds per day and 30,000 pounds per any consecutive 12-month period.
- For the purposes of this permit condition, “or equivalent” is defined as that a HAP and TAP content of a new welding wire and grinding wheels/grinding discs, as listed in SDS, is equal to or less than the HAP and TAP content, as listed in the SDS, of the respective welding wire and grinding wheels/grinding discs in this permit condition. Use of any welding wire or grinding

discs with new TAP or HAP are not allowed under this permit condition. New TAP or HAP emissions must be evaluated in accordance with Permit Condition 2.15.

- The door of the welding bay area at the facility shall be closed during welding operation.
- Emissions from the welding operations at the facility shall be captured and filtered; and shall be re-circulated back into the welding bay area, as per applicant submittal.

4.4 Fuel Type

All heaters at the facility shall use natural gas exclusively.

4.5 Natural Gas Use Limits

The natural gas consumption at the entire facility shall not exceed 24.4 million standard cubic feet (MMscf) per any consecutive 12-month period.

Monitoring and Recordkeeping Requirements

4.6 Records of Welding Wire and Grinding Wheels/Grinding Discs

- For ProStar S6-ER70S-6 and Resinoid Bonded Abrasives or equivalent
 - Every day, the permittee shall monitor and record the welding wire, grinding wheels, and grinding discs daily usage, in pounds, to demonstrate compliance with the daily throughput limit.
 - Every month, the permittee shall monitor and record the welding wire, grinding wheels, and grinding discs monthly usage, in pounds. The permittee shall add the monthly welding wire, grinding wheels, and grinding discs, usage to the previous consecutive 11-month wire, wheels, and discs usage to demonstrate compliance with the annual throughput limit.
 - Every month, the permittee shall record the welding wire type, welding wire product name and model, and the corresponding welding process.

Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representative upon request.

4.7 Natural Gas Use Monitoring

The permittee shall monitor and record the amount, in million standard cubic feet, of natural gas combusted at the entire facility, each month and for the most recent 12-month period.

Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representative upon request.

5. General Provisions

General Compliance

5.1 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.]

5.2 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]

5.3 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

5.4 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

5.5 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]

5.6 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

- 5.7 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.
- 5.8 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.
- 5.9 Within **30 days, or up to 60 days when requested** 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]

Monitoring and Recordkeeping

- 5.10 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

- 5.11 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

5.12 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

5.13 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

5.14 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

5.15 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

5.16 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]