



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

June 06, 2007

Certified Mail No. 7005 1160 0000 1550 9323

Peter Spampinato
Site Operations Manager
Hewlett Packard, Inc.
11311 Chinden Blvd, MS881
Boise, Idaho 83714

RE: Facility ID No. 001-00086, Hewlett Packard, Boise Main Site
Final Permit Letter

Dear Mr. Spampinato:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0053 to Hewlett Packard, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on April 09, 2007. This permit is effective immediately and replaces permit No. T2-001-00086, issued on February 5, 1996, the terms and conditions of which no longer apply. This permit does not release Hewlett Packard from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Boise Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations 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 call Marcia Porter at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\MP\slm

Project No. P-2007.0053

Enclosures

c: Thomas Krinke, Boise Regional Office
Leonard Herr, Boise Regional Office
Bill Rogers, Permit Coordinator (Ltr only)
Marcia Porter, Permit Writer
Marilyn Seymore/ Pat Rayne, Air Quality Division
Laurie Kral, US EPA Region 10
Permit Binder
Source File
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)
Mark Miller, Hewlett Packard EHS Consultant, <mark miller@hp.com>

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
1. PERMIT TO CONSTRUCT SCOPE.....	4
2. FACILITY WIDE CONTROLS	7
3. CHEMICAL, ORGANIC CHEMICAL, AND CHEMICAL PRODUCT: VAPOR FUGITIVE EMISSIONS.....	8
4. BOILERS NO.'S: B5-1, B5-2, B6-1, B6-2, B6-3, SB6-1, SB6-2, SB6-3.	9
5. FACILITY DIESEL FIRED EQUIPMENT AND DIESEL FUEL TANKS.....	11
6. PERMIT TO CONSTRUCT GENERAL PROVISIONS	13

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
B	Air Quality facility emissions classification for a natural minor source in Idaho.
bldg	building
btu	British thermal unit
CFR	Code of Federal Regulations
CO	Carbon Monoxide
DEQ	Department of Environmental Quality
gr/dscf	grains (1 lb = 7,000 grains) per dry standard cubic feet
EPA	U.S. Environmental Protection Agency
HCl	Hydrochloric acid
HP	Hewlett Packard
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
kW	kilowatts
lb/hr	pound per hour
MMBtu/hr	million British thermal units per hour
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compounds

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
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1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 Operation of space heating and emergency power equipment for R & D development and manufacture of computer peripherals.
- 1.2 Initially in 1996, Hewlett Packard failed to get a PTC, the initial Tier 2 No. T2-030049 was therefore required. This facility is not one of the facilities identified in the Northern Ada County SIP. Therefore, issuing a PTC now, is appropriate. This PTC replaces Tier II operating permit No. T2-030049, issued on February 5, 1996, the terms and conditions of which shall no longer apply.

Regulated Sources

- 1.3 Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Chemical Processing Facility	uncontrolled
3	Hydrochloric Acid at the Chemical Processing Facility	uncontrolled
4	<u>Boilers:</u> All are Natural Gas fired; with no other fuel as backup: <u>Boiler No. B5-1:</u> Manufacturer: Cleaver Brooks Model No.: CB-200-150 Manufacturer Serial No.: L-66428 Rated capacity: 6.28 MMBtu Burner type: Cleaver Brooks <u>Boiler No. B5-2:</u> Manufacturer: Cleaver Brooks Model No.: CB-200-300 Manufacturer Serial No.: L-66429 Rated capacity: 12.55 MMBtu Burner type: Cleaver Brooks <u>Boiler No. B6-1:</u> Manufacturer: Sellers Model No.: SY-150-YGNIS Manufacturer Serial No.: 97412-R Rated capacity: 6.28 MMBtu Burner type: PeabodyGordon-Piatt <u>Boiler No. B6-2:</u> Manufacturer: Sellers Model No.: SY-350-YGNIS Manufacturer Serial No.: 97413-R Rated capacity: 14.65 MMBtu Burner type: PeabodyGordon-Piatt	<u>(9) All Boilers:</u> uncontrolled

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

4	<p><u>Boiler No. B6-3:</u> Manufacturer: Cleaver Brooks Model No.: CB700 Manufacturer Serial No.: OL101209 Rated capacity: 14.64 MMBtu Burner type: Cleaver Brooks</p> <p><u>Boiler No. SB6-1:</u> Manufacturer: Cleaver Brooks Model No.: CB700-30 Manufacturer Serial No.: L-101200 Rated capacity: 1.26 MMBtu Burner type: Cleaver Brooks</p> <p><u>Boiler No. SB6-2:</u> Manufacturer: Cleaver Brooks Model No.: CB700-30 Manufacturer Serial No.: L-101199 Rated capacity: 1.26 MMBtu Burner type: Cleaver Brooks</p> <p><u>Boiler No. SB6-3:</u> Manufacturer: Cleaver Brooks Model No.: CB700-30 Manufacturer Serial No.: L-101201 Rated capacity: 1.26 MMBtu Burner type: Cleaver Brooks</p>	<p><u>All Boilers:</u> uncontrolled</p>
5	<p><u>Emergency Generators:</u> All are No. 2 Diesel Fuel Fired with no other back-up fuel:</p> <p>Generator No.: EG-1 Manufacturer: Onan Model No.: 125DGEA Manufacturer Serial No.: 45342908 Rated Power: 110 kW</p> <p>Generator No.: EG2-1 Manufacturer: Onan Model No.: 300DFML27619N Manufacturer Serial No.: 80816225 Rated Power: 300 kW</p> <p>Generator No.: EG2-2 Manufacturer: Onan Model No.: DFJC900 Manufacturer Serial No.: 44811422 Rated Power: 175 kW</p> <p>Generator No.: EG-3 Manufacturer: Onan Model No.: DFED Manufacturer Serial No.: 37185228 Rated Power: 500 kW</p>	<p><u>All Emergency Generators:</u> uncontrolled</p>

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

5	<p>Generator No.: EG-4 Manufacturer: Onan Model No.: 125DGEA Manufacturer Serial No.: 45404420 Rated Power: 125 kW</p> <p>Generator No.: EG-5 Manufacturer: Cummins Model No.: DFAC4479274 Manufacturer Serial No.: 35000005 Rated Power: 230 kW</p> <p>Generator No.: EG6-1 Manufacturer: Caterpillar Model No.: 3406 Manufacturer Serial No.: 45346163 Rated Power: 400kW</p> <p>Generator No.: EG6-2 Manufacturer: Onan Model No.: DFED 4490038 Manufacturer Serial No.: 4ZR02378 Rated Power: 500 kW</p> <p>Generator No.: EG7 Manufacturer: Onan Model No.: 125DEGA Manufacturer Serial No.: 37195775 Rated Power: 125 kW</p>	<u>All Emergency Generators:</u> uncontrolled
5	(13) Diesel fuel tanks	uncontrolled
5	<p>Fire Pump Building 1 Detroit Diesel Allison Model No. 10447110 Serial No. 4A0212189 4 inch diameter stack 15 foot stack height</p> <p>Fire Pump Building 7 Clark Diesel GM Model No. DDFO04AN Serial No. 4A-265573 4 inch diameter stack 10 foot stack height</p>	uncontrolled

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

2. FACILITY WIDE CONTROLS

Facility Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651, rules for the control of fugitive dust.
- 2.2 The permittee shall monitor and maintain records of the frequency and methods used to control fugitive dust.
- 2.3 The permittee shall maintain records of fugitive dust complaints and how they were remedied. Include the date the complaint was received, description, permittee's assessment of the complaints validity, corrective action taken, and the date of that action.
- 2.4 The permittee shall comply with IDAPA 58.01.01.550-562, Air Pollution Emergency Rule, where applicable.

Fuel Grain Loading Limits for Boilers and Fuel Oil Sulfur Content Limit

2.5 Particulate Matter Emissions

In accordance with IDAPA 58.01.01.676, the PM emissions from any stack from Boilers B5-2, B6-2, and B6-3, shall not exceed 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when combusting gas.

2.6 Fuel Oil Sulfur Content Limit

No ASTM Grade 2 Fuel oil containing sulfur in excess of 0.5% by weight shall be burned in the emergency generators and in the fire pumps.

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, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.

Excess Emissions

- 2.8 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

3. CHEMICAL, ORGANIC CHEMICAL, AND CHEMICAL PRODUCT: VAPOR FUGITIVE EMISSIONS

3.1 Process Description

HP uses organic liquid materials such as alcohol, fluxes, surfactants, and epoxies in the manufacturing process facility. Fluxes, which are primarily isopropanol, are used in the solder paste reflow process and in hand soldering operations. Isopropanol is also used to surface-clean finished product. Surfactants are added to deionized water to aid in parts cleaning.

Some of the water treatment chemicals used at the facility are Dearborn 547, Dearcide 723, Dearcide 737, and polyelpH 955. These chemicals are used for cooling water treatment and as a microbiocide and slimicide treatment. Hydrochloric acid, sulfuric acid, and sodium hydroxide are also used at the facility for water treatment system. Hydrochloric acid is processed at the water treatment facility in a closed container. Sodium hydroxide is used to maintain the pH of treated water at a certain level.

3.2 Control Discription

Emissions from the chemical processing facility are uncontrolled.

3.3 Chemical Consumption Limits

- Annual chemical usage for the chemicals associated with VOC emissions shall not exceed 169.43 T/yr at the applicants request.
- Annual Hydrochloric acid usage shall not exceed 25.67 T/yr at the applicants request.

3.4 Evaporation and Uncontrolled Emission Minimization

All reasonable measures shall be taken to minimize the evaporation of HCl and uncontrolled emissions of VOC to the atmosphere.

3.5 Monitoring and Record Keeping Requirements

The permittee shall monitor and record the amount of chemicals purchased by the facility on a rolling 12 month basis. The most recent two years records of data shall be kept on-site at all times and shall be made available to DEQ representatives upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

4. BOILERS NO.'S: B5-1, B5-2, B6-1, B6-2, B6-3, SB6-1, SB6-2, SB6-3.

4.1 Process Description

Boilers B6-1 and B6-2 are Sellers boilers, with all remaining boilers manufactured by Cleaver Brooks.

B6-3 is greater than 10 MMBtu (14.64 MMBtu) and is subject to 40 CFR 60, Subpart Dc. B5-2 and B6-2 are also greater than 10 MMBtu; however they were both constructed prior to 1989, leaving them exempt from 40 CFR 60, Subpart Dc.

The remaining boilers are B5-1, B6-1, SB6-1, SB6.2, SB6.3 and are 6.278, 6.278, 1.26, 1.26, and 1.26 MMBtu (respectively). All eight boilers are natural gas-fired and are used for the facility's hot water and building heat requirements.

4.2 Emissions Control Description

The emissions from the boilers are uncontrolled.

Emissions Limits

4.3 Boiler NSPS – Emissions Limits

On and after the compliance date specified in 40 CFR 60.40c(a) the permittee shall comply with all applicable emissions limit requirements of the National Standards of Performance for Small Industrial-Commercial-Institutional Steam Generation Units, 40 CFR 60, Subpart Dc. The permittee shall refer to the following sections of Subpart Dc of 40 CFR 60:

4.3.1 Standard for PM in Accordance with 40 CFR 60.43c (e)(1)

- The PM emissions from Boiler No. 1 and Boiler No. 2 shall each not exceed 0.030 pounds per million Btu of heat input in accordance with 40 CFR 60.43c (e)(1).
- Compliance with PM standard shall be determined in accordance with 40 CFR 60.45c.
- As an alternative to meeting the requirements of 40 CFR 60.43c (e)(1), the owner or operator of an affected facility shall meet the requirements of 40 CFR 60.43c (e)(2).
- Affected facilities subject to 40 CFR 60.43c (e)(1), are also subject to the requirements of 40 CFR 60.43c (c) and (d).

4.3.2 NSPS-Subpart Dc Sulfur Dioxide Emission Standard (Boiler No. B6-3)

The SO₂ emissions from any ASTM Grade 2 fuel oil boiler stack shall not exceed 0.50 lb/MMBtu heat input, as required in 40 CFR 60.42.c(d), or as an alternative, the sulfur content in any ASTM Grade 2 fuel oil combusted in any process boiler shall not be greater than 0.5 weight percent.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

Operating Requirements

4.4 Fuel Type Limit

All boilers shall be fired on natural gas exclusively.

4.5 Boiler Operations

Each boiler at this facility shall be maintained and operated according to manufacturer's specifications and recommendations. The operations manual or equivalent, for each boiler, shall be left on site and shall be made available to DEQ upon request.

4.6 NSPS-Subpart Dc Applicability Notification, Monitoring, Reporting, and Recordkeeping Requirements (Boiler No. B6-3)

In accordance with 40 CFR 60.48Dc.(a), the permittee shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup as required by 40 CFR 60.7 for the boilers.

The notification shall include the following:

- The design heat input capacity of the affected facility, and
- fuels to be combusted at the affected facility.

Notification shall be submitted to EPA and DEQ at the following addresses:

U.S. EPA – Region 10
Office of Air Quality
1200 Sixth Avenue
Seattle, WA. 98101
Phone: (206)-553-1200

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, Idaho 83706-2239
Phone: (208)-373-0550

The monitoring and recordkeeping of fuels combusted in the boilers shall comply with 40 CFR 60.48c(g) and the following:

- The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day, unless alternative monitoring, recordkeeping, and reporting is formally approved by EPA.
- The permittee shall maintain written documentation of any EPA-approved monitoring, recordkeeping, and reporting requirements of the boilers.

Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request. The facility shall comply with monitoring of natural gas usage in this permit section by putting boiler B6-3 (serial no.: OL101209) on a separate metering system from the rest of the boilers listed in Table 1.1 of this permit.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

5. FACILITY DIESEL FIRED EQUIPMENT AND DIESEL FUEL TANKS

5.1 Process Description

There are nine existing diesel-fired emergency generators at HP. The primary purpose of the generators is to supply electrical power to the facility during normal local utility supplied electrical interruptions. The generator’s manufacturers, model numbers, rated output in kW, and serial numbers are shown in Table 1.1 of this permit.

There are two fire pumps located at this facility and their primary purpose is for property protection. The pumps manufacturers, model numbers, and serial numbers are shown in Table 1.1 of this permit.

There are diesel fuel tanks located at locations at this facility. Their purpose is for fuel storage for generators, fire pumps, and utility vehicles. All are less than 600 gallons in size and all hold diesel fuel exclusively.

5.2 Emissions Control Description

Emissions from the emergency generators, fire pumps, and fuel tanks are uncontrolled.

Emissions Limits

5.3 ASTM Grade 2 Fuel Oil

All emergency generators and fire pumps shall be fired on ASTM Grade 2 diesel fuel exclusively.

Operating Requirements

5.4 Emergency Generator and Fire Pump Operations

Each emergency generator and fire pump at this facility shall be maintained and operated according to manufacturer’s specifications and recommendations. The operations manual or equivalent, for each emergency generator and fire pump, shall be left on site and shall be made available to DEQ upon request.

5.5 Hours of Operations for Maintenance

- The operation of each emergency generator and fire pump shall not exceed a maximum of six hours in any 24-hour period. Multiple generators can operate concurrently during a single day for load testing.
- The operation of each emergency generator and each fire pump shall not exceed a maximum of 500 hours in any consecutive 12-month period.

These hours of operations limits shall not apply during times of electric power outages to HP. These hours of operation shall not apply in the event of a facility fire.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

Monitoring and Recordkeeping Requirements

5.6 ASTM Grade 2 Fuel Oil Monitoring

The permittee shall maintain purchase records, or equivalent, from the manufacturer or distributor that shows the sulfur content of the ASTM Grade 2 fuel oil delivered to the facility on an as-received basis. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

5.7 Emergency Generator and Fire Pump Operation

The permittee shall monitor and record the date, number of hours of operation, and the reason for the operation of each emergency generator and fire pump. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

6. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

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 and 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.]

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. 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

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. 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. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

- c. 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;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. 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, 5/1/94]

Performance Testing

- 6. 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.

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.

Within 30 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]

Monitoring and Recordkeeping

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information 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 and 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]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0053

Permittee:	Hewlett Packard	Facility ID No. 001-00086
Location:	Boise, Idaho	

Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. 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

10. 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

11. 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

12. 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

13. 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.