STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

September 9, 2011

Carl Niemeier, VP Operations
NxEdge, Inc.
7500 W. Mossy Cup Street
Boise, ID 83709

RE: Facility ID No. 001-00202, NxEdge, Inc., Boise
Final Permit Letter

Dear Mr. Niemeier:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2008.0097 Project 60887 to NxEdge, Inc. located at Boise for the addition of two make-up air units and increased throughputs. 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 June 23, 2011.

This permit is effective immediately and replaces PTC No. P-2008.0097, issued on September 18, 2008. This permit does not release NxEdge, Inc. 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 Boise Regional Office, 1445 N. Orchard, Boise, Idaho 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, Air Quality Compliance Officer, at (208) 373-0419 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 Kelli Wetzel at (208) 373-0502 or kelli.wetzel@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\KW

Permit No. P-2008.0097 PROJ 60887

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Air Quality PERMIT TO CONSTRUCT State of Idaho Department of Environmental Quality	PERMIT NUMBER	CLASS	SIC
	P-2008.0097	SM	3471
	FACILITY ID	AQCR	NAICS
	001-00202	64	332812/332813
	UTM ZONE	UTM COORDINATES (km)	
	11	558.5 Easting	4825.4 Northing

PERMITTEE			
NxEdge, Inc.			
PROJECT			
PROJECT No. 60887, Permit to Construct Modification			
MAILING ADDRESS	**CITY**	**STATE**	**ZIP**
7500 W. Mossy Cup Street	Boise	ID	83709
FACILITY CONTACT	**TITLE**	**TELEPHONE**	
Carl Niemeier	VP Operations	(208) 362-7200	
RESPONSIBLE OFFICIAL	**TITLE**	**TELEPHONE**	
Carl Niemeier	VP Operations	(208) 362-7200	
EXACT PLANT LOCATION		**COUNTY**	
7500 W. Mossy Cup, Boise, ID		Ada	

GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Application of engineered coatings, precision manufacturing, and material cleaning and revitalization services

PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and 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.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the 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.

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

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

Kelli Wetzel	**DATE ISSUED**	September 9, 2011
KELLI WETZEL, PERMIT WRITER		
Mike Simon		
MIKE SIMON, STATIONARY SOURCE MANAGER		

PERMIT TO CONSTRUCT SCOPE 3
FLUOROPOLYMER (FP) PROCESS 5
SPUTTERED TARGETS AND SERVICES (STS) PROCESS 7
ADVANCED ENGINEERED COATING (AEC) PROCESS 14
CLEANING AND REFURBISHING (C&R) PROCESS 17
MAKE-UP AIR UNITS 19
PERMIT TO CONSTRUCT GENERAL PROVISIONS 20

PERMIT TO CONSTRUCT SCOPE

Purpose

1. This is a modification of a permit to construct to increase the aluminum oxide media usage for AEC parts preparation room one and two and install an additional filter unit in each room, increase the annual powder coating usage in the fluoropolymer (FP) area curing ovens, increase the powder coating usage in the spray paint booths, and add two existing unpermitted make-up air units.
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.
3. This PTC replaces Permit to Construct No. P-2008.0097, issued on September 18, 2008.
4. The emission sources regulated by this permit are listed in the following table.

Table 1 REGULATED SOURCES

Source Descriptions	Emission Controls
Fluoropolymer (FP) Process: HVLP wet coating application spray booth with integrated Paint Pockets filters and with a Twin Cities model TB-30E4 two hp exhaust fan rated at 10,000 cfm (WETPOWC)	Integral filter unit and HVLP spray gun
FP Process: Electrostatic Halar powder coating application booth with integrated Paint Pockets filters and with a Greenheck model TCB-2-22 four hp exhaust fan rated at 4,000 cfm (WETPOWC)	Integral filter unit and an electrostatic powder application gun
FP Process: Electrostatic Teflon powder coating application booth with integrated Paint Pockets filters and with a Greenheck model TCB-2-18 four hp exhaust fan rated at 3,500 cfm (WETPOWC)	Integral filter unit and an electrostatic powder application gun
FP Process: Electrostatic Halar and Teflon powder coating application booth with integrated Paint Pockets filters and with a Greenheck model TCB-2-22 four hp exhaust fan rated at 4,000 cfm (WETPOWC)	Integral filter unit and an electrostatic powder application gun
(FP) Process Curing Ovens: One Wisconsin Oven Corp. model EWN-612-8 natural gas-fired curing oven with a heat input rating of 0.6 MMBtu/hr and two electric curing ovens (ECOVEN1)	N/A
Sputtered Targets and Services (STS) Process: Brigs model BPC-180 plasma spray application chamber with a maximum capacity of 30.4 lbs-powder/hr (GEN3)	Donaldson Torit model 20 cyclone and a MAC model 4M2F16 filter unit (MAC1) w/ high-efficiency cartridge filters
STS Process: Praxair model SG-100 plasma spray application chamber with a maximum capacity of 18.8 lbs-powder/hr (GEN4)	MAC cyclone and a MAC model 2M2F8 filter unit (MAC2) w/ high-efficiency cartridge filters
STS Process: Brigs model BPC-180 plasma spray application chamber with a maximum capacity of 30.4 lbs-powder/hr (GEN5)	Camfil-Farr cyclone and a Farr model GS24 filter unit (FARR2) w/ high-efficiency cartridge filters

Table 2 REGULATED SOURCES (continued)

Source Descriptions	Emission Controls
STS Process: NxEdge custom manufactured research and development spray room with a maximum capacity of 70 lbs-powder/hr (RD1)	Camfil-Farr cyclone and a Farr model GS20 filter unit (FARR1) w/ high-efficiency cartridge filters
STS Process: NxEdge custom manufactured bonder/blaster wire bonder and abrasive blasting cabinet with a maximum capacity of 200 lbs-media/hr (BB1)	MAC cyclone and a MAC filter unit (MAC3) w/ Farr model HMPTUF cartridge filters
STS Process: NxEdge custom manufactured finishing stand manual sanding operation with a maximum capacity of 2 tubes/hr (FS1)	MAC cyclone and a MAC filter unit (MAC3) w/ Farr model HMPTUF cartridge filters
Advanced Engineered Coating (AEC) Process: Automated application spray booth (SBU1)	Camfil-Farr GS-16 filter unit w/ high-efficiency cartridge filters (SBUFARR1)
AEC Process: Automated application spray booth (SBU2)	Camfil-Farr GS-16 filter unit w/ high-efficiency cartridge filters (SBUFARR2)
AEC Process: Automated application spray booth (SBU3)	Camfil-Farr GS-16 filter unit w/ high-efficiency cartridge filters (SBUFARR3)
AEC Process: Spray booth air supply heater (SBUHTR1)	N/A
AEC Process: Spray booth air supply heater (SBUHTR2)	N/A
AEC Process: Spray booth air supply heater (SBUHTR3)	N/A
AEC Process: Two Titan Abrasive Systems model 4836 RPD media blasting cabinets with a Dayton model 5C532 exhaust fan rated at 2,970 cfm, located in the AEC area (AECPP1)	Titan model 4836 RPD filter units and a custom model MERV-8 filter (AECPP1)
AEC Process: Two Titan Abrasive Systems model 4848 RPD media blasting cabinets with a Greenheck model H-Cube-098 exhaust fan rated at 1,180 cfm and an Empire model PF-3648 media blasting cabinet, all located in the FP area (AECPP2)	Titan model 4848 RPD filter units, an Empire model DCM-80A filter unit, and a custom model MERV-8 filter (AECPP2)
Cleaning and Refurbishing (C&R) Process: Two Empire Abrasive Equipment model PF-3648 media blasting cabinets (CAMBC)	Empire model DCM-80A filter units
West Make-Up Air Unit: One Greenheck model TSU-220 natural gas-fired make-up air unit with a heat input rating of 1.42 MMBtu/hr (WMAU1)	N/A
(FP) Area Make-Up Air Unit: One Greenheck model DGX-125 natural gas-fired make-up air unit with a heat input rating of 2.21 MMBtu/hr (NMAU1)	N/A

[September 9, 2011]

FLUOROPOLYMER (FP) PROCESS

Process Description

5. The FP process consists of the WETPOWC spray application booths (four total), each equipped with overspray arrestors and exhaust fans, the ECOVEN1 0.6 MMBtu/hr natural gas-fired curing oven and the electrically-fired curing ovens (two total). Typically, one of the spray booths is used to apply wet coatings. The three remaining spray booths are used to apply dry powder coatings. The ovens are used to cure powder coated products.

6. Emission Controls Description

Table 3 FLUOROPOLYMER PROCESS DESCRIPTION

Emissions Units / Processes	Emission Control Devices	Emission Points
One wet coating application spray booth (WETPOWC)	Integral filter unit and HVLP wet coating spray gun	Exhaust stack EP-3
Three electrostatic powder coating application booths (WETPOWC)	Integral filter unit and electrostatic powder coating application guns	Exhaust stack EP-3
One natural gas-fired curing oven (ECOVEN1)	N/A	Exhaust stack EP-9
Two electric curing ovens (ECOVEN1)	N/A	Exhaust stack EP-9

Emission Limits

7. Emission Limits

The emissions from the WETPOWC stack shall not exceed any emissions rate limit in the following table.

Table 4 WETPOWC EMISSION LIMITS[a]

Source Description	MDI[b]	VOC
	lb/day[c]	T/yr[d]
Four wet coating and electrostatic powder coating application booths	0.53	1.2

a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
b) Methylene Diphenyl Isocyanate (MDI).
c) Pounds per day, based upon Rust Preventative POR-15 wet coating usage.
d) Tons per any consecutive 12-calendar month period.

8. Opacity Limit

Emissions from the one wet coating application booth, the three electrostatic powder coating application booths, the natural gas-fired curing oven, and the two electric curing ovens stacks, or any other stack, vent, or functionally equivalent opening associated with the FP process, 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.

Operating Requirements

9. Permitted Fuel

The ECOVEN1 curing oven shall only combust natural gas as fuel.

10. Wet Coating Usage Limits

Wet coating usage for the entire FP process shall not exceed 5 gal/day and 50 gal/yr for each coating used. In addition, Rust Preventative POR-15 wet coating usage in the FP process shall not exceed 0.20 gal/day and 50 gal/yr.

11. Powder Coating Usage Limits

Powder coating usage in the FP process shall not exceed 400 lb/day and 12,000 lb/yr combined for Halar™ and Teflon™ powders.

[September 9, 2011]

12. Spray Application Booths Overspray Arrestors

The air pollution control equipment identified in Table 2 shall be operated whenever the wet coating and powder coating spray application booths are operating.

Monitoring and Recordkeeping Requirements

13. Material Purchase Records and Material Data Safety Sheets

For each material used in the FP process, including but not limited to wet coatings, powder coatings, solvents, and degreasers, the permittee shall record and maintain the following records:

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

14. Material Usage Records

The permittee shall monitor and record monthly, in gallons and pounds, the usage of all wet and powder coating related materials used in the FP process.

15. VOC and MDI Monitoring Requirements

Using the purchase records and MSDS required by the permit conditions and the material usage records required by the permit conditions, the permittee shall monitor and record the monthly and annual VOC emissions and daily MDI emissions in tons and pounds, respectively, from the FP process in order to demonstrate compliance. Annual emissions shall be determined by summing monthly emissions over each previous consecutive 12-month period.

16. Recordkeeping

The permittee shall comply with the recordkeeping requirements in the General Provisions.

SPUTTERED TARGETS AND SERVICES (STS) PROCESS

Process Description

17. The STS arc spray process coats small parts, and preps, coats, and finishes stainless steel tubes in a series of steps. The steps are performed in the following process areas: the GEN3 plasma spray applicator, the GEN4 plasma spray applicator, the GEN5 plasma spray applicator, the RD1 research and development spray room, the BB1 bonder blaster operation, and the FS1 finishing stand operation.

18. Emission Controls Description

Table 4 SPUTTERED TARGETS AND SERVICES PROCESS DESCRIPTION

Emissions Units / Processes	Emission Control Devices	Emission Points
Plasma spray applicator (GEN3)	Cyclone and filter unit (MAC1)	Exhaust stack EP-1
Plasma spray applicator (GEN4)	Cyclone and filter unit (MAC2)	Exhaust stack EP-1
Plasma spray applicator (GEN5)	Cyclone and filter unit (FARR2)	Exhaust stack EP-13
Research and development spray room (RD1)	Cyclone and filter unit (FARR1)	Exhaust stack EP-2
Bonder blaster (BB1)	Cyclone and filter unit (MAC3)	Exhaust stack EP-14
Finishing stand (FS1)	Cyclone and filter unit (MAC3)	Exhaust stack EP-14

Emission Limits

19. Emission Limits

The emissions from the three plasma spray applicators, the research and development spray room, the bonder blaster operation, and the finishing stand operation stacks shall not exceed any emissions rate limit in the following table.

Table 5 SPUTTERED TARGETS AND SERVICES PROCESS EMISSION LIMITS[a]

Source Description	PM_{10}[b]	
	lb/hr[c]	T/yr[d]
GEN3 and GEN4 (EP-1)	0.06	0.26
GEN5 (EP-13)	0.086	0.024
RD1 (EP-2)	0.003	0.0002
BB1 and FS1 (EP-14)	0.043	0.05

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 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.

20. GEN3 PM_{10}, Aluminum (Al), and Silicon (Si) Emissions Limits

Emissions from the GEN3 plasma spray applicator associated with the STS process shall not exceed any of the following limits (based upon plasma spray powder usage):

- 0.027 lb-PM_{10}/hr,
- 0.12 T-PM_{10}/yr,
- 0.016 lb-Al/hr, or
- 0.027 lb-Si/hr

21. GEN4 PM_{10} Emissions Limits

Emissions from the GEN4 plasma spray applicator associated with the STS process shall not exceed any of the following limits (based upon plasma spray powder usage):

- 0.033 lb-PM_{10}/hr
- 0.14 T-PM_{10}/yr

22. Opacity Limit

Emissions from the three plasma spray applicators, the research and development spray room, the bonder blaster operation, and the finishing stand operation stacks, or any other stack, vent, or functionally equivalent opening associated with the STS Process, 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.

Operating Requirements

23. Plasma Spray Powder and Wire Usage Limits for the RD1 Operation

Total plasma spray powder and wire usage in the RD1 research and development spray room operation shall not exceed 1,000 lb/day and 5,000 lb/yr.

24. Filter Units and Cyclones Operation

The air pollution control equipment identified in Table 4 shall be operated when any of the STS process equipment is operating.

25. Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to continuously measure the pressure differential across the MAC1, MAC2, FARR2, FARR1, and MAC3 cyclone and filter units.

26. Pressure Differential Across Air Pollution Control Device

The pressure differential across the MAC1, MAC2, FARR2, FARR1, and MAC3 cyclone and filter units shall not exceed 8" of water.

27. Operations and Maintenance Manual Requirements

The permittee shall maintain an O&M manual for the air pollution control equipment associated with the STS process which describes the procedures that will be followed to comply with the General Provisions and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

28. Material Purchase, Production Records, and Material Data Safety Sheets

For each material used and produced in the STS process, including but not limited to plasma spray wire, chromium powder, plasma spray powder, and bond wire, the permittee shall record and maintain the following records:

- Material purchase records,
- Production records, and
- Material Safety Data Sheets (MSDSs).

These records shall remain on site for a period of five years and shall be made available to DEQ representatives upon request.

29. Material Usage Records

The permittee shall monitor and record monthly, in pounds, the usage of each manufacturing-related material for the STS process.

30. Production Records

The permittee shall monitor and record monthly the quantity and type of tubes produced in the STS process. The production records shall remain on site for a period of five years and shall be made available to DEQ representatives upon request.

31. PM_{10}, Carcinogenic TAPs, Non-Carcinogenic TAPs, and HAPs Emissions Monitoring Requirements

Using the material purchase, production records, and MSDS required by the permit conditions, the materials usage records required by the permit conditions, and the production records required by the permit conditions, the permittee shall monitor and record the monthly and annual PM_{10}, aluminum, and silicon emissions in pounds and tons, respectively, from the STS process in order to demonstrate compliance. Annual emissions shall be determined by summing monthly emissions over each previous consecutive 12-month period.

32. Pressure Differential

When operating, the permittee shall monitor and record once per day the pressure differential across the MAC1, MAC2, FARR2, FARR1, and MAC3 cyclone and filter units to demonstrate compliance with the permit conditions.

33. Recordkeeping

The permittee shall comply with the recordkeeping requirements in the General Provisions.

40 CFR 63 Subpart WWWWWW - National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations

34. Affected Source – 40 CFR 63.11504 Am I subject to this subpart?

In accordance with 40 CFR 63.11504, the permittee is subject to this subpart. The permittee is an area source of HAPs and will perform one or more activities listed in the section, including thermal spraying and dry mechanical polishing, and has emissions of one or more of the following metals: cadmium, chromium, lead, manganese, and nickel.

[September 9, 2011]

35. Affected Source – 40 CFR 63.11505 What parts of my plant does this subpart cover?

In accordance with 40 CFR 63.11505(a), this subpart applies to each thermal operation that applies one or more of the plating and polishing metal HAP and each dry mechanical polishing operation that emits one or more of the plating and polishing metal HAP. The specific operations at this facility that are subject to this subpart are the Gen5 Tube Spray Chamber, the RD1 Research and Development Spray Room, the BB1 Bonder/Blaster, and the FS1 Finishing Stand.

In accordance with 40 CFR 63.11505(b), this permittee is an existing affected source because construction or reconstruction commenced on or before March 14, 2008.

In accordance with 40 CFR 63.11505(e), the permittee is exempt from the obligation to obtain a permit under 40 CFR part 70 or 71 provided that a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a) is not required for a reason other than becoming an area source subject to this subpart.

[September 9, 2011]

36. Compliance Date – 40 CFR 63.11506 What are my compliance dates?

In accordance with 40 CFR 63.11506(a), the permittee must achieve compliance with the applicable provisions of the subpart no later than July 1, 2010.

[September 9, 2011]

Operating Requirements

37. Standards and Management Practices – 40 CFR 63.11507 What are my standards and management practices?

In accordance with 40 CFR 63.11507(e), the permittee must operate a capture system that captures particulate matter emissions from the dry mechanical polishing process and transports the emissions to a cartridge, fabric, or high efficiency particulate air (HEPA) filter.

In accordance with 40 CFR 63.11507(e)(1), the permittee must operate all capture and control devices according to the manufacturer's specifications and operating instructions.

In accordance with 40 CFR 63.11507(e)(2), the permittee must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

[September 9, 2011]

38. Compliance Requirements – 40 CFR 63.11508 What are my compliance requirements?

In accordance with 40 CFR 63.11508(a), the permittee must submit a Notification of Compliance Status in accordance with 40 CFR 63.11509(b).

In accordance with 40 CFR 63.11508(b), the permittee must be in compliance with the applicable management practices and equipment standards in this subpart at all times.

In accordance with 40 CFR 63.11508(c), the permittee must demonstrate initial compliance by satisfying the requirements specified in paragraphs (c)(1) through (11). Paragraphs (c)(8) and (9) apply to the permittee's dry mechanical polishing operation and existing permanent thermal spraying operation.

In accordance with 40 CFR 63.11508(c)(8)(i) through (iii), the permittee must install a control system that is designed to capture PM emissions from the polishing operation and exhaust them to a cartridge, fabric, or HEPA filter. The permittee must state in the Notification of Compliance Status that it has installed the control system according to the manufacturer's specifications and instructions. The permittee must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

In accordance with 40 CFR 63.11508(c)(9)(i) through (iii), the permittee must install a control system that is designed to capture PM emissions from the thermal spraying operation and exhaust them to a water curtain, fabric filter, or HEPA filter. The permittee must state in the Notification of Compliance Status that it has installed and are operating the control system according to the manufacturer's specifications and instructions. The permittee must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators.

In accordance with CFR 63.11508(d)(1) and (2), the permittee must demonstrate continuous compliance with the applicable management practices and equipment standards specified in the subpart. The permittee must always operate and maintain all affected sources, including all air pollution control equipment. The permittee must prepare an annual compliance certification according to the requirements specified in 40 CFR 63.11509(c) and keep it in a readily-accessible location for inspector review.

[September 9, 2011]

Reporting and Recordkeeping Requirements

39. Notification, Reporting, and Recordkeeping – 40 CFR 63.11509 What are my notification, reporting, and recordkeeping requirements?

In accordance with 40 CFR 63.11509(a), the permittee must submit an Initial Notification not later than 120 calendar days after July 1, 2008 and include a description of the compliance method for each affected source.

In accordance with 40 CFR 63.11509(b), the permittee must submit a Notification of Compliance Status before close of business on July 1, 2010. In accordance with paragraphs (b)(2)(i) through (iv), the Notification of Compliance Status must include a list of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources, methods used to comply with the applicable management practices and equipment standards, a description of the capture and emission control systems used to comply with the applicable equipment standards, and a statement by the owner or operator of the affected sources as to whether the source is in compliance with the applicable standards or other requirements. If the permittee makes a change to any items in paragraphs (b)(2)(i),(iii), and (iv) that does not result in a deviation, an amended Notification of Compliance Status should be submitted within 30 days of the change.

In accordance with 40 CFR 63.11509(c), the permittee must prepare an annual certification of compliance report. This report does not need to be submitted unless a deviation from the requirements of the subpart has occurred during the reporting year. In accordance with paragraphs (c)(1) through (7) of this section, the annual certification of compliance report must state whether the facility has operated and maintained the control systems according to the manufacturer's specifications and instructions, must be prepared no later than January 31 of the year immediately following the reporting period, and must be kept in a readily-accessible location for inspector review.

In accordance with 40 CFR 63.11509(d), if a deviation from the compliance requirements specified occurred during the year, the permittee must report the deviations, along with the corrective action taken, and submit this report to the delegated authority.

In accordance with 40 CFR 63.11509(e), the permittee must keep records of the Initial Notification and Notification of Compliance Status that was submitted and all documentation supporting those notifications, records on the occurrence and duration of each startup, shutdown, or malfunction of process equipment, records of the occurrence and duration of each malfunction of the required air pollution control and monitoring equipment, records of all required maintenance performed on the air pollution control and monitoring equipment, and the records required to show continuous compliance with each applicable management practice and equipment standard as specified in 40 CFR 63.11508(d).

In accordance with 40 CFR 63.11509(f), the permittee must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record onsite for at least 2 years and then the records may be kept offsite for the remaining 3 years.

[September 9, 2011]

Other Requirements

40. General Provisions – 40 CFR 63.11510 What General Provisions apply to this subpart?

In accordance with 40 CFR 63.11510, the permittee must comply with the requirements of the General Provisions (40 CFR part 63, subpart A) according to Table 1 of this subpart.

[September 9, 2011]

Table 6 NESHAP 40 CFR 63, SUBPART A – SUMMARY OF GENERAL PROVISIONS

Section	Subject	Summary of Section Requirements
63.13	Addresses	• All requests, reports, applications, submittals, and other communications associated with 40 CFR 63, Subpart(s) shall be submitted to: Director Air and Waste US EPA 1200 Sixth Avenue Seattle, WA 98101 and Boise Regional Office Department of Environmental Quality 1445 N. Orchard Boise, ID 83706
63.4(a)	Prohibited Activities	• No permittee must operate any affected source in violation of the requirements of 40 CFR 63 in accordance with 40 CFR 63.4(a). No permittee subject to the provisions of this part shall fail to keep records, notify, report, or revise reports as required under this part.
63.4(b)	Circumvention/ Fragmentation	• No permittee shall build, erect, install or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. • Fragmentation which divides ownership of an operation, within the same facility among various owners where there is no real change in control, will not affect applicability in accordance with 40 CFR 63.4(c).
63.6(b) and (c)	Compliance Dates	• The permittee of any new or reconstructed source must comply with the relevant standard as specified in 40 CFR 63.6(b). The permittee of a source that has an initial startup before the effective date of a relevant standard must comply not later than the standard's effective date in accordance with 40 CFR 63.6(b)(1). The permittee of a source that has an initial startup after the effective date of a relevant standard must comply upon startup of the source in accordance with 40 CFR 63.6(b)(2). • The permittee of any existing sources must comply with the relevant standard by the compliance date established in the applicable subpart or as specified in 40 CFR 63.6(c). The permittee of an area source that increases its emissions of hazardous air pollutants such that the source becomes a major source shall be subject to relevant standards for existing sources in accordance with 40 CFR 63.6(c)(5).

Table 6 (continued) NESHAP 40 CFR 63, SUBPART A – SUMMARY OF GENERAL PROVISIONS

Section	Subject	Summary of Section Requirements
63.10	Recordkeeping and Reporting Requirements	• The permittee shall maintain files of all required information recorded in a form suitable and readily available for expeditious inspection and review in accordance with 40 CFR 63.10(b)(1). The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. • The permittee shall maintain relevant records of the following in accordance with 40 CFR 63.10(b)(2); The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards; The occurrence and duration of each malfunction of operation or the required air pollution control and monitoring equipment; All required maintenance performed on the air pollution control and monitoring equipment; Actions taken during periods of startup or shutdown when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan; or Actions taken during periods of malfunction when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan; All information necessary, including actions taken, to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan (see 40 CFR 63.6(e)(3)) when all actions taken during periods of startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist," or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events); • If an permittee determines that his or her stationary source that emits one or more HAP, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to a relevant standard because of limitations on the source's potential to emit or an exclusion, the permittee must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first in accordance with 40 CFR 63.10(b).

[September 9, 2011]

ADVANCED ENGINEERED COATING (AEC) PROCESS

Process Description

41. Process Description

The AEC process coats metal parts using a robotic spray process. This process uses argon to transfer powder coating material from automated hoppers to a hot gas stream that then deposits it onto parts. The process consists of the SBU1, SBU2, and SBU3 automated powder spray rooms, each equipped with the SBUHTR1, SBUHTR2, and SBUHTR3 heated air supply systems, the SBUFARR1, SBUFARR2, and SBUFARR3 filter units, a robotic plasma spray arm for powder coating parts, the AECPP1 (two cabinets total) and AECPP2 (three cabinets total) media blasting operations, and air pollution control equipment associated with this process.

42. Emission Controls Description

Table 7 ADVANCED ENGINEERED COATING PROCESS DESCRIPTION

Emissions Units / Processes	Emission Control Devices	Emission Points
Automated powder coating room (SBU1)	Filter unit (SBUFARR1)	Exhaust stack EP-6
Automated powder coating room (SBU2)	Filter unit (SBUFARR2)	Exhaust stack EP-7
Automated powder coating room (SBU3)	Filter unit (SBUFARR3)	Exhaust stack EP-8
Spray booth air supply heater (SBUHTR1)	N/A	Exhaust stack EP-10
Spray booth air supply heater (SBUHTR2)	N/A	Exhaust stack EP-11
Spray booth air supply heater (SBUHTR3)	N/A	Exhaust stack EP-12
Two media blasting cabinets (AECPP1)	Filter units	Exhaust stack EP-16
Three media blasting cabinets (AECPP2)	Filter units	Exhaust stack EP-15

Emission Limits

43. Emission Limits

The emissions from the three automated powder coating rooms and the five media blasting cabinet stacks shall not exceed any emissions rate limit in the following table.

Table 8 ADVANCED ENGINEERED COATING PROCESS EMISSION LIMITS[a]

Source Description	PM_{10}[b]	
	lb/hr[c]	T/yr[d]
SBU1 (EP-6)	0.053	0.23
SBU2 (EP-7)	0.053	0.23
SBU3 (EP-8)	0.053	0.23
AECPP1 (EP-16)	0.0034	0.015
AECPP2 (EP-15)	0.0063	0.0038

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 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.

44. Aluminum Oxide and Aluminum Metal Emissions Limit for the SBU1 Operation

Aluminum oxide and aluminum metal emissions from the SBU1 automated powder coating room associated with the AEC process shall not exceed 1.27 lb/day (based upon powder coating usage).

45. Yttrium Emissions Limit for the SBU2 Operation

Yttrium emissions from the SBU2 automated powder coating room associated with the AEC process shall not exceed 1 lb/day (based upon powder coating usage).

46. Opacity Limit

Emissions from the three automated powder coating rooms, the three spray booth air supply heaters, and the five media blasting cabinets stacks, or any other stack, vent, or functionally equivalent opening associated with the AEC process, 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.

Operating Requirements

47. Permitted Fuel

The SBUHTR1, SBUHTR2, and SBUHTR3 spray booth air supply heaters shall only combust natural gas as fuel.

48. Aluminum Oxide Usage Limits for the AECPP1 Operation

New aluminum oxide blasting media usage in the AECPP1 media blasting operation shall not exceed 150,000 lbs/yr.

[September 9, 2011]

49. Aluminum Oxide Usage Limits for the AECPP2 Operation

New aluminum oxide blasting media usage in the AECPP2 media blasting operation shall not exceed 120,000 lbs/yr.

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50. Blasting Media Usage Limits for the AECPP2 Operation

Total new blasting media usage in the AECPP2 media blasting operation shall not exceed 125,000 lbs/yr.

[September 9, 2011]

51. Filter Units and Cyclones Operation

The air pollution control equipment identified in Table 6 shall be operated when any of the AEC process equipment is operating.

52. Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to continuously measure the pressure differential across the SBUFARR1, SBUFARR2, and SBUFARR3 filter units.

53. Pressure Differential Across Air Pollution Control Device

The pressure differential across each filter unit controlling emissions from the SBU1, SBU2, and SBU3 automated powder spray rooms shall not exceed 8" of water.

54. Filter Cleaning for the Air Pollution Control Device

The filters contained within the AECPP1 and AECPP2 filter units shall be cleaned daily (when they have been operated) per manufacturer and O&M manual recommendations and specifications.

55. Operations and Maintenance Manual Requirements

The permittee shall maintain an O&M manual for the air pollution control equipment associated with the AEC process which describes the procedures that will be followed to comply with the General Provisions and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

56. Material Purchase Records and Material Data Safety Sheets

For each material used in the AEC process, including but not limited to powder coatings and media blasting materials, the permittee shall record and maintain the following records:

- Material purchase records, and
- Material Safety Data Sheets (MSDS).

57. Material Usage Records

The permittee shall monitor and record monthly, in pounds, the usage of all coating and blasting media related materials used in the AEC process.

58. PM_{10}, Aluminum Oxide and Metal, and Yttrium Emissions Monitoring Requirements

Using the purchase records and MSDS required by the permit conditions and the materials usage records required by the permit conditions, the permittee shall monitor and record the monthly and annual PM10, aluminum oxide and metal, and yttrium emissions in pounds and tons, respectively, from the AEC process in order to demonstrate compliance. Annual emissions shall be determined by summing monthly emissions over each previous consecutive 12-month period.

59. Pressure Differential Records

When operating, the permittee shall monitor and record once per day the pressure differential across SBUFARR1, SBUFARR2, and SBUFARR3 filter units to demonstrate compliance with permit conditions.

60. Filter Cleaning Records

When operating, the permittee shall record once per day when the AECPP1 and AECPP2 filter units are cleaned in order to demonstrate compliance with the permit conditions.

61. Recordkeeping

The permittee shall comply with the recordkeeping requirements in the General Provisions.

CLEANING AND REFURBISHING (C&R) PROCESS

Process Description

62. The cleaning and refurbishing (C&R) process includes the CAMBC suction/pressure media blasting cabinets (two total) and the APBR parts buffing room. The media blasters are used to prepare aluminum and stainless steel parts for coating. The two media blasters are equipped with reclaimer cyclones and filter units and vent into a common 6" exhaust duct that emits outside above the building roof vent to the atmosphere. The aluminum parts buffing room is used to hand-buff finished aluminum parts. Air from the room is drawn through a fan and exhausted through a roof vent.

63. Emission Controls Description

Table 9 CLEANING AND REFURBISHING PROCESS DESCRIPTION

Emissions Units / Processes	Emission Control Devices	Emission Points
Two suction/pressure media blasting cabinets (CAMBC)	Integral filter unit	Exhaust stack EP-4
Parts buffing room (APBR)	N/A	Exhaust stack EP-5

Emission Limits

64. Emission Limits

The emissions from the two suction/pressure media blasting cabinets and the parts buffing room stacks shall not exceed any emissions rate limit in the following table.

Table 10 CLEANING AND REFURBISHING EMISSION LIMITS[a]

Source Description	PM_{10}[b]	
	lb/hr[c]	T/yr[d]
CAMBC (EP-4)	0.0056	0.025

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 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.

65. Blasting Media Usage Limits for the CAMBC Operation

New blasting media usage in the CAMBC suction/pressure media blasting cabinets operation shall not exceed 19,000 lbs/yr.

66. Opacity Limit

Emissions from the the two suction/pressure media blasting cabinets and the parts buffing room stacks, or any other stack, vent, or functionally equivalent opening associated with the C&R process, 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.

Operating Requirements

67. Filter Units Operation

The air pollution control equipment identified in Table 8 shall be operated when any of the C&R process equipment is operating.

68. Filter Cleaning for the Air Pollution Control Device

The filters contained within the CAMB filter unit shall be cleaned daily (when they have been operated) per manufacturer and O&M manual recommendations and specifications.

69. Operations and Maintenance Manual Requirements

The permittee shall maintain an O&M manual for the air pollution control equipment associated with the C&R process which describes the procedures that will be followed to comply with the General Provisions and the air pollution control device requirements contained in this permit. The manual shall remain onsite at all times and made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

70. Material Purchase Records and Material Data Safety Sheets

For each material used in the C&R process, including but not limited to media blasting materials, the permittee shall record and maintain the following records:

- Material purchase records, and
- Material Safety Data Sheets (MSDS).

71. Material Usage Records

The permittee shall monitor and record monthly the usage of blasting media related materials used in the C&R process.

72. PM_{10} Emissions Monitoring Requirements

Using the purchase records and MSDS required by the permit conditions and the materials usage records required by the permit conditions, the permittee shall monitor and record the monthly and annual PM10 emissions, in pounds and tons, respectively, from the AEC process in order to demonstrate compliance. Annual emissions shall be determined by summing monthly emissions over each previous consecutive 12-month period.

73. Filter Cleaning Records

When operating, the permittee shall record once per day when the filters are cleaned for the CAMBC filter unit to demonstrate compliance with the permit conditions.

74. Recordkeeping

The permittee shall comply with the recordkeeping requirements in the General Provisions.

MAKE-UP AIR UNITS

Process Description

75. Fresh air is supplied to the FP area spray booths with a make-up air unit (NMAU1) located outside to the north of the building. The combustion gases are emitted via the FP spray booth exhaust. Fresh air is also supplied to the northwest manufacturing area with a make-up air unit (WMAU1) located outside to the west of the building. The combustion gases are emitted via the northwest area exhaust.

[September 9, 2011]

76. Emission Controls Description

Table 11 MAKE-UP AIR UNIT PROCESS DESCRIPTION

Emissions Units / Processes	Emission Control Devices	Emission Points
Make-up Air Unit (NMAU1)	N/A	Exhaust stack EP-3
Make-up Air Unit (WMAU1)	N/A	Exhaust stack EP-17

[September 9, 2011]

Emission Limits

77. Opacity Limit

Emissions from the two make-up air unit stacks, or any other stack, vent, or functionally equivalent opening associated with the make-up air units, 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.

[September 9, 2011]

Operating Requirements

78. Permitted Fuel

The NMAU1 and WMAU1 make-up air units shall only combust natural gas as fuel.

[September 9, 2011]

PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

79. 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.]

80. 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]

81. 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

82. 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 or 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

83. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:

- 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.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

84. 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, at its option, may 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.

85. 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.

86. 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

87. 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]

Excess Emissions

88. 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

89. 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

90. 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

91. 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

92. 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

93. 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]