



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

February 20, 2003

**Certified Mail No. 7000 1530 0005 5348 5523**

Mark M. Holzmer, Team Leader  
Department of Energy  
Argonne Area Office-West  
P.O. Box 2528  
Idaho Falls, ID 83403-2528

RE: AIRS Facility No. 011-00022, Department of Energy, Idaho Falls  
Utility Paint Spray Booth Amendment

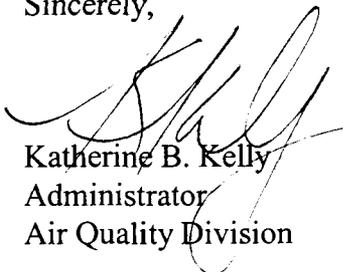
Dear Mr. Holzmer:

The Idaho Department of Environmental Quality (Department) is issuing an amended Permit To Construct (PTC) No. 011-00022 for the Department of Energy (DOE) in accordance with IDAPA 58.01.01.200 through 223, *Rules for the Control of Air Pollution in Idaho*. This PTC is effective immediately and is based on your permit application received on December 23, 2002.

This permit does not release DOE from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

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 Mike Simon at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,



Katherine B. Kelly  
Administrator  
Air Quality Division

KK/DH/sm  
Enclosures

Project No. P-020520



**Air Quality  
PERMIT TO CONSTRUCT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: 011-00022

AQCR: 061

CLASS: A

SIC: 9999

ZONE: 12

UTM COORDINATE (km): 366.4 , 4828.0

**1. PERMITTEE**

Department of Energy – Argonne Area Office-West

**2. PROJECT**

Utility Paint Spray Booth

**3. MAILING ADDRESS**

P.O. Box 2528

**CITY**

Idaho Falls

**STATE**

ID

**ZIP**

83403-2528

**4. FACILITY CONTACT**

W. Greg Bass

**TITLE**

Environmental Engineer

**TELEPHONE**

(208) 533-7184

**5. RESPONSIBLE OFFICIAL**

Mark M. Holzmer

**TITLE**

Team Leader

**TELEPHONE**

(208) 533-7446

**6. EXACT PLANT LOCATION**

35 miles west of Idaho Falls on U.S. Highway 20, 3.4 miles north of Taylor Blvd

**COUNTY**

Bingham

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Government Energy Research and Development

**8. GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, 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 (Department) 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 is not transferable to another person, place, or piece or set of 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 of design or equipment may require Department approval pursuant to IDAPA 58.01.01.200, et seq.

KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: February 20, 2003

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CAA	Clean Air Act
Department	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIC	Standard Industrial Classification
SIP	State Implementation Plan
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 011-00022**

**Permittee:** Department of Energy  
**Location:** Idaho Falls, Idaho

**Date Issued:** February 20, 2003

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

This Permit to Construct (PTC) incorporates and replaces the following permits:

- PTC No. 011-00022, issued February 19, 1990
- PTC No. 011-00022, issued February 21, 1992
- PTC No. 011-00022, issued August 23, 1993

***Regulated Sources***

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

**Table 1.1 REGULATED EMISSIONS SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	Utility Paint Spray Booth	Binks cabinet type exhaust chamber

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**2. UTILITY PAINT SPRAY BOOTH**

**2.1 Emissions Control Description**

Emissions from the utility paint spray booth are controlled by a Binks cabinet type exhaust chamber with a particulate control efficiency of 87%.

**Table 2.1 UTILITY PAINT SPRAY BOOTH**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>
Utility Paint Spray Booth	Binks cabinet exhaust chamber

***Emissions Limits***

**2.2 Emissions Limits**

The particulate matter (PM) and volatile organic compound (VOC) emissions from the utility paint spray booth stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

**Table 2.2 UTILITY PAINT SPRAY BOOTH EMISSIONS LIMITS**

<b>Source Description</b>	<b>PM</b>	<b>VOC</b>
	<b>T/yr</b>	<b>T/yr</b>
Utility Paint Spray Booth	0.2	0.8

**2.3 Opacity Limit**

Emissions from the paint spray booth stack, or any other stack, vent, or functionally equivalent opening associated with the paint spray booth 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***

**2.4 Paint Types**

Only those paints and solvents as submitted in the permit application, or comparable replacements, which comply with the emissions limits in Permit Condition 2.2 of this permit may be used in the utility paint spray booth unless prior Department approval is obtained.

**2.5 Exhaust Filter Operations and Maintenance (O&M) Manual**

Within 60 days of permit issuance the permittee shall have developed an O&M manual for the exhaust filter. This manual shall contain, at a minimum, the filter replacement schedule. The manual shall remain on site and be made available to Department representatives upon request.

**2.6 Exhaust Filter Use**

The utility paint spray booth shall not be operated unless all exhaust filters are in place and intact.

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**2.7 Filter Type**

Only filters which have a manufacturer guarantee to remove at least 87% of particulate shall be used in the cabinet type exhaust chamber.

***Monitoring and Recordkeeping Requirements***

**2.8 Toxic Emissions Analysis**

The permittee shall perform a toxic emissions analysis on any new paint or solvent that is not listed on the PTC application. The permittee shall not use any paints or solvents with potential hourly toxic emissions rates that are greater than screening emissions rates listed in IDAPA 58.01.01.585 or 586 without prior Department approval. Records of all toxic analyses performed over the most recent two-year period shall be maintained onsite and made available to Department representatives upon request. The records shall contain, at a minimum, the paint and solvent specifications and all of the calculations used to determine the hourly emissions rates.

**2.9 Paint and Solvent Records**

The permittee shall maintain records of the types, quantities, solvent content, and date of application for all paints and solvents used in the paint booth. The permittee shall calculate the total VOC emissions for the previous month assuming all solvents are emitted to the atmosphere. The most recent two years of records shall be maintained onsite and made available to Department representatives upon request.

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**3. SUMMARY OF EMISSIONS LIMITS**

Table 3.1 provides a summary of all emissions limits required by this permit:

**Table 3.1 SUMMARY OF EMISSIONS LIMITS**

<b>DOE, ANL-West Emissions Limits<sup>a</sup> - Annual<sup>b</sup> (T/yr)</b>		
<b>Source Description</b>	<b>PM</b>	<b>VOC</b>
	<b>T/yr</b>	<b>T/yr</b>
Utility Paint Spray Booth	0.2	0.8

<sup>a</sup> As determined by a pollutant-specific EPA reference method, Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

<sup>b</sup> As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emissions rate by the allowable hours per **year** that the process(es) may operate(s), or by actual annual production rates.

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#### 4. EMISSIONS CHANGES

The following table is a summary of the emissions increases and decreases associated with this permit amendment. The emissions inventory table is provided for informational purposes only.

**Table 4.1 EMISSIONS INVENTORY**

<b>Pollutant</b>	<b>Annual Emissions Increase (T/yr)</b>	<b>Annual Emissions Decrease (T/yr)</b>	<b>Change in Annual Emissions (T/yr)</b>
NO <sub>x</sub>	0.0	0.0	0.0
SO <sub>2</sub>	0.0	0.0	0.0
CO	0.0	0.0	0.0
PM/PM <sub>10</sub>	0.0	0.0	0.0
VOC	0.0	0.0	0.0
TAPS/ HAPS <sup>a</sup>	0.0	0.0	0.0
Total:	0.0	0.0	0.0

<sup>a</sup> TAPS/HAPS = toxic air pollutants / hazardous air pollutants

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**Permittee:** Department of Energy  
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**Date Issued:** February 20, 2003

**5. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

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., and the permittee is subject to penalties for each day of noncompliance.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify the Department, in writing, of the required information for the following events within five working days after occurrence:
  - Initiation of Construction - Date
  - Completion/Cessation of Construction - Date
  - Actual Production Startup - Date
  - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If compliance testing is specified, the permittee must schedule and perform such testing within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup. This requirement shall be construed as an ongoing requirement. The permittee shall not operate the source without testing within 180 days. If testing is not conducted within 180 days after initial startup, then each day of operation thereafter without the required compliance test constitutes a violation. Such testing must **strictly** adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from the Department. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.

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7. 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.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to the department, 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.