



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Brad Little, Governor
Jess Byrne, Director

September 21, 2020

Jennifer Parrott, Environmental Program Manager
Idaho State University
921 South 8th Ave, Stop 8042
Pocatello, ID 83209

RE: Facility ID No. 005-00029, Idaho State University, Pocatello
Final Permit Letter

Dear Ms. Parrott:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2013.0015 Project 62498 to Idaho State University located at Pocatello for the revision of annual welding rod limits. 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 email received August 27, 2020.

This permit is effective immediately and replaces PTC No. P-2013.0015 issued on July 30, 2020. This permit does not release Idaho State University from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with Melissa Gibbs, Regional Air Quality Manager, at (208) 236-6160 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 Christina Boulay at (208) 373-0502 or christina.boulay@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon".

Mike Simon
Stationary Source Bureau Chief
Air Quality Division

MS\cb

Permit No. P-2013.0015 PROJ 62498

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Idaho State University
Permit Number P-2013.0015
Project ID 62498
Facility ID 005-00029
Facility Location 749 E. Humbolt, Stop 8137
Pocatello, Idaho 83209-8137

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued September 21, 2020

Christina Boulay

Christina Boulay, Permit Writer

Mike Simon

Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) to revise the annual welding rod limits.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2013.0015 issued on July 30, 2020.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
3	<u>Boiler No. 2</u> Manufacturer: Babcock & Wilcox Company Model: H-1329 Manufactured date: 1947 Rating: 23 MMBtu/hr Allowable fuel type: Natural gas	None
4	<u>Boiler No. 3</u> Manufacturer: Superior Company Model: Not available Manufactured date: 1957 Rating: 26.92 MMBtu/hr Allowable fuel type: Natural gas	
5	<u>Boiler No. 4</u> Manufacturer: Keystone Model: Victory Manufactured date: 2005 Rating: 72.84 MMBtu/hr - 60,000 lbs steam/hr Allowable fuel type: Natural gas	Coen low-NOx burner
6	<u>Pathological Waste Incinerator</u> Manufacturer: National Incinerator Model: 2H46M Incinerator type: Dual chamber Burner type: Axial firing Waste retention time: 60 minutes Rated heating capacity: 1.6 MMBtu/hr Max. hourly combustion rate: 0.8 MMBtu/hr Fuel type: Natural gas	Secondary combustion chamber
9	<u>Three Paint Booths</u> Paint booth No. 1: Overspray filter – Manufacturer: GFS Wave Media filter or equivalent; Model: FL-ERP or equivalent Coating spray gun(s): Manufacturer: ANEST IWATA, Sata Jet, Devil Bliss or equivalent; transfer efficiency: 65% Paint booth No. 2: Overspray filter– Manufacturer: GFS Wave Media filter or equivalent; Model: FL-ERP or equivalent Coating spray gun(s): Manufacturer: ANEST IWATA, Sata Jet, Devil Bliss or equivalent; transfer efficiency: 65%	Overspray filters

Permit Section	Source	Control Equipment
	Paint booth No. 3: Manufacturer: Graco or equivalent; Model: FL-ERP or equivalent; Coating spray gun(s): Manufacturer - Pro-Finish CSA or equivalent; Spray Gun Transfer Efficiency: 65%; PM Control Efficiency: 99 %; Filter Manufacturer: GFS or equivalent	
8	<u>Biodiesel Production Process^(a)</u>	
	<u>Diesel and Gasoline Storage Tanks</u>	
7	<u>Nine Emergency Generator Engines</u>	
10	<u>Welding EAMES Building</u> Qty (18) Miller Syncrowave 250DX 907194 Qty (6) Miller Syncrowave Qty (18) Lincoln Electric Invertec V350 Pro Qty(17) Miller 70 SeriesXMT350 Qty(1) Miller XMT 304 CC/CV 70 Series <u>Welding Facilities Maintenance</u> Qty (1) Miller Syncrowave 180sd Qty (1) Miller Syncrowave 520 xmatic Qty (1) Lincoln Wirematic 255	99.0% Fume Control Filter for Stainless Steel 309 Welding Only
11	<u>Plasma Cutting</u> <u>Abrasive Blasting</u> Manufacturer: Econoline Model: 101717R-A Manufacturer: Allsource Model: 41500 Manufacturer: Econoline Model: 101698R-A	<u>Completely Enclosed Booths with Baghouses:</u> Manufacturer: Econoline Type: 100 CFM DK Control efficiency: 75.0% or greater for PM ₁₀ and PM _{2.5}
	<u>Solvent Cleaning</u> Five Sinks	None
	<u>Pottery Kiln</u> Manufacturer: Cooperworks – Custom – Built Model: P-330 Date of Construction: April 2020 Rating: 2 Burners at 0.4 MMBtu/hr each	

a) The biodiesel process is exempt from PTC – See Content Manager Record # 2013AAG753

[7/30/2020]

Other Emissions Units

1.4 Table 1.2 identifies all other air pollution emissions units existing at the facility. The only requirements that apply to the emissions units listed in Table 1.2 are in the facility-wide conditions located in Section 2 of this permit.

Table 1.2 Other Air Pollution Emissions Units at the Facility

Source Description		
<p><u>Boiler B8</u> Manufacturer: Monitor, or equivalent Model: M723-40 Rating: 1.674 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B9</u> Manufacturer: Cleaver Brooks, or equivalent Model: CB 80 HP Rating: 2.678 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B10</u> Manufacturer: Monitor, or equivalent Model: M723-60 Rating: 2.511 MMBtu/hr Fuel type: Natural gas</p>
<p><u>Boiler B11</u> Manufacturer: Pacific National, or equivalent Model: PS-60GS Rating: 2.677 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B12</u> Manufacturer: Sellers, or equivalent Model: 77 Commodore Rating: 3.348 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B13</u> Manufacturer: National BD, or equivalent Model: H2-2100A-CEBRCAG Rating: 2.1 MMBtu/hr Fuel type: Natural gas</p>
<p><u>Boiler B14</u> Manufacturer: Laars, or equivalent Model: LC-2871 Rating: 2.87 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B15</u> Manufacturer: National, or equivalent Model: 10-66 Rating: 2.25 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B16</u> Manufacturer: Smith, or equivalent Model: N95-1075 Rating: 3.844 MMBtu/hr Fuel type: Natural gas</p>
<p><u>Boiler B17</u> Manufacturer: Weil McLain, or equivalent Model: LGB series 1 Rating: 1.3 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B18</u> Manufacturer: Laars, or equivalent Model: RHCH1200NACF2FXX Rating: 1.2 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B19</u> Manufacturer: Not available Model: Not available Rating: 0.299 MMBtu/hr, or equivalent Fuel type: Natural gas</p>
<p><u>Boiler B20</u> Manufacturer: Not available Model: 211-20-WT-1 Rating: 3.0 MMBtu/hr, or equivalent Fuel type: Natural gas</p>	<p><u>Boiler B21</u> Manufacturer: HydroTherm, or equivalent Model: AM300 Rating: 0.299 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B22</u> Manufacturer: Raypak, or equivalent Model: Not available Rating: 0.726 MMBtu/hr Fuel type: Natural gas</p>
<p><u>Kiln K23</u> Rating: 0.0028 MMBtu/hr, or equivalent Fuel type: Natural gas</p>	<p><u>Kiln K24</u> Rating: 0.1 MMBtu/hr, or equivalent Fuel type: Natural gas</p>	<p><u>Burnoff Furnace F25</u> Manufacturer: Johnson burner, or equivalent Rating: 0.2 MMBtu/hr Fuel type: Natural gas</p>
<p><u>Melting Furnace F26</u> Manufacturer: Pyramid burner, or equivalent Rating: 0.1 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B27</u> Manufacturer: Crane, or equivalent Model: 66A series Rating: 1.75 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B28</u> Manufacturer: Crane, or equivalent Model: Sunnysdale 302 Rating: 0.525 MMBtu/hr Fuel type: Natural gas</p>
<p><u>Boiler B29</u> Manufacturer: Laars, or equivalent Model: NB33854 Rating: 0.5 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B30</u> Manufacturer: Laars, or equivalent Model: NB 33978 Rating: 0.5 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B31</u> Manufacturer: A. O. Smith, or equivalent Model: TW225V-942 Rating: 0.225 MMBtu/hr Fuel type: Natural gas</p>
<p><u>Boiler B32</u> Manufacturer: A. O. Smith, or equivalent Model: BT365A BBO Rating: 0.365 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B33</u> Manufacturer: Lochinvar Corp. Model: CHN2070 Rating: 20.7 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B34</u> Manufacturer: Lochinvar Corp. , or equivalent Model: CFN0990PM Rating: 0.832 MMBtu/hr Fuel type: Natural gas</p>
<p><u>Boiler B35</u> Manufacturer: A. O. Smith, or equivalent Model: BTC197970/BTC275973 Rating: 0.275 MMBtu/hr Fuel type: Natural gas</p>	<p><u>Boiler B36:</u> Manufacturer: Laars, or equivalent Model: RHCH1600NACF2Exx Manufactured date: 2009 Rating: 1.6 MMBtu/hr Allowable fuel type: Natural gas</p>	<p><u>Boiler B37:</u> Manufacturer: Precision, or equivalent Model: FPS-58-60 equipped with a Power Flame Low-NOx burner or equivalent Manufactured date: 2013 Rating: 2.5 MMBtu/hr Allowable fuel type: Natural gas</p>

Source Description		
<u>Emergency Generator No. 1</u> Manufacturer: Intermountain Power Model: Generac 2000 Burner type: Not available Rating: 0.539 MMBtu/hr Fuel type: Natural gas	<u>Emergency Generator No. 2</u> Manufacturer: Spectrum Model: 400DS60 Burner type: Not available Rating: 1.38 MMBtu/hr Fuel type: No. 1 or No. 2 fuel oil	<u>Emergency Generator No. 3</u> Manufacturer: Generac Power System Model: Generac6.8GN Burner type: Not available Rating: 0.884 MMBtu/hr Fuel type: Natural gas
<u>Emergency Generator No. 4</u> Manufacturer: Kohler Model: 60REOZJB Burner type: Not available Rating: 4.154 MMBtu/hr Fuel type: No. 1 or No. 2 fuel oil	<u>Emergency Generator No. 5</u> Manufacturer: Generac Model: SC400 Burner type: Not available Rating: 1.526 MMBtu/hr Fuel type: No. 1 or No. 2 fuel oil	There are also five diesel emergency generator engines (Nos. 5 through 9) existing at ISU. These engines are subject NSPS, Subpart IIII. Refer to Section 7 of this PTC.
<u>Art Department Ash Barrel</u> Burns wood chips and paper Burns less than 100 lb/hr and 1,000 lb/yr Located 100 meters from property line	<u>Biodiesel Production Process – Portable Unit</u> The process is exempt from permitting	<u>Emergency Generator No. 1</u> Manufacturer: Kohler Model: KG40 Burner type: Spark Ignition Rating: 65 hp Fuel type: LP-NG Subject to NSPS 40 CFR 60 Subpart IIII, refer to section 7 of this PTC
<u>Emergency Generator No. 2</u> Manufacturer: Kohler Model: 40REOZK Burner type: Compression Ignition Rating: 65 hp Fuel type: Diesel Subject to NSPS 40 CFR 60 Subpart IIII, refer to section 7 of this PTC	<u>Emergency Generator No. 3</u> Manufacturer: CAT Model: C9 200KW Burner type: Compression Ignition Rating: 322 hp Fuel type: Diesel Subject to NSPS 40 CFR 60 Subpart IIII, refer to section 7 of this PTC	<u>Emergency Generator No. 4</u> Manufacturer: CAT Model: C9 200 KW Burner type: Compression Ignition Rating: 322 hp Fuel type: Diesel Subject to NSPS 40 CFR 60 Subpart IIII, refer to section 7 of this PTC
<u>Emergency Generator No. 5</u> Manufacturer: ONAN Model: 4BTA3.9-G5 Burner type: Compression Ignition Rating: 55 hp Fuel type: Diesel Subject to NSPS 40 CFR 60 Subpart IIII, refer to section 7 of this PTC	<u>Emergency Generator No. 6</u> Manufacturer: ONAN Model: 4B3.9-G2 Burner type: Compression Ignition Rating: 55 hp Fuel type: Diesel Subject to NSPS 40 CFR 60 Subpart IIII, refer to section 7 of this PTC	<u>Emergency Generator No. 7</u> Manufacturer: ONAN Model: 4B3.9-G2 Burner type: Compression Ignition Rating: 55 hp Fuel type: Compression Ignition Subject to NSPS 40 CFR 60 Subpart IIII, refer to section 7 of this PTC
<u>Emergency Generator No. 8</u> Manufacturer: Kohler Model: 25REZG Burner type: Spark Ignition Rating: 40 hp Fuel type: Natural Gas Subject to NSPS 40 CFR 63 Subpart ZZZZ, refer to section 2 of this PTC	<u>Emergency Generator No. 9</u> Manufacturer: Generac Model: QT025A Burner type: Spark Ignition Rating: 40 hp Fuel type: Natural Gas Subject to NSPS 40 CFR 60 Subpart IIII, refer to section 7 of this PTC	<u>Emergency Generator No. 11</u> Manufacturer: Kohler Model: 60ROZJ81 Burner type: Compression Ignition Rating: 96 hp Fuel type: Diesel Non-Stationary I.C. Engine, not applicable to 40 CFR 63 ZZZZ or 40 CFR 60 IIII
<u>Emergency Generator No. 10</u> Manufacturer: ONAN Model: 30.0EK-15R/23545M Burner type: Spark Ignition Rating: 48 hp Fuel type: Natural Gas Subject to NSPS 40 CFR 60 Subpart IIII, refer to section 7 of this PTC		

[7/30/2020]

2 Facility-Wide Conditions

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following practices, where practical:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust;
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
 - Paving of roadways and their maintenance in a clean condition, where practical; and
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

- 2.6** The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken. A compilation of the most recent five years of records shall be kept on site and shall be made available to DEQ representatives upon

Visible Emissions

- 2.7** The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8** The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:
- a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).
 - or
 - b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.
- 2.9** The permittee shall maintain records of the results of each visible emissions inspection and each opacity test, when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Open Burning

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

Reports and Certifications

- 2.11** In accordance with IDAPA 58.01.01.123, any reporting required by this permit—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the

document(s) are true, accurate, and complete. Any reporting required by this permit, with the exception of a Portable Equipment Registration and Relocation form, shall be submitted to the following address:

Air Quality Permit Compliance
 Department of Environmental Quality
 Pocatello Regional Office
 444 Hospital Way, #300
 Pocatello, ID 83201
 Phone: (208) 236-6160
 Fax: (208) 236-6168

Fuel Burning Equipment

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

Sulfur Content

2.13 In accordance with IDAPA 58.01.01.725, the permittee shall not sell, distribute, use, or make available for use any of the following:

- Distillate fuel oil containing more than the following percentages of sulfur:
 - ASTM Grade 1 fuel oil, 0.3% by weight
 - ASTM Grade 2 fuel oil, 0.5% by weight
- DEQ may approve an exemption from these fuel sulfur content requirements (IDAPA 58.01.01.725.01-04) if the permittee demonstrates that, through control measures or other means, sulfur dioxide (SO₂) emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

2.14 The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as-received basis.

NSPS/NESHAP General Provisions

2.15 NSPS 40 CFR 60, Subpart A – General Provisions

The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A—“General Provisions”—in accordance with 40 CFR 60.1. A summary of requirements for affected facilities is provided in Table 2.1.

Table 2.1 NSPS 40 CFR 60, Subpart A - Summary of General Provisions

Section	Subject	Summary of Section Requirements
60.4	Address	<ul style="list-style-type: none"> • <u>All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart(s) shall be submitted to:</u> Pocatello Regional Office 444 Hospital Way, #300 Pocatello, ID 83201
60.7(a),(b), and (f)	Notification and Recordkeeping	<ul style="list-style-type: none"> • Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date. • Notification shall be furnished of initial startup postmarked within 15 days of such date. • Notification shall be furnished of any physical or operational change that may increase

		<p>emissions postmarked 60 days before the change is made.</p> <ul style="list-style-type: none"> Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative. Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.
60.8	Performance Tests	<ul style="list-style-type: none"> At least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present. Within 60 days of achieving the maximum production rate, but not later 180 days after initial startup, performance test(s) shall be conducted and a written report of the results of such test(s) furnished. Performance testing facilities shall be provided as follows: <ul style="list-style-type: none"> Sampling ports adequate for test methods applicable to such facility. Safe sampling platform(s). Safe access to sampling platform(s). Utilities for sampling and testing equipment. Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f).
60.11(a), (d), (f), and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8. At all times, including periods of startup, shutdown, and malfunction, the owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.
60.11(b), (c), and (e)	Compliance with Standards and Maintenance Requirements (Opacity)	<ul style="list-style-type: none"> Compliance with opacity standards shall be determined by Method 9 in Appendix A of 40 CFR 60. The permittee may elect to use COM measurements in lieu of Method 9, provided notification is made at least 30 days before the performance test. The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided. Opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 in accordance with the requirements and exceptions in 40 CFR 60.11(e).
60.12	Circumvention	<ul style="list-style-type: none"> No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.
60.13	Monitoring Requirements (CMS)	<ul style="list-style-type: none"> All CMS and monitoring devices shall be installed and operational prior to conducting performance tests required by 40 CFR 60.8. A performance evaluation of the COMS or CEMS shall be conducted before or during any performance test and a written report of the results of the performance evaluation furnished. Reporting requirements include submitting performance evaluations reports within 60 days of the evaluations required by this section, and submitting results of the performance evaluations for the COM within 10 days before a performance test, if using a COM to determine compliance with opacity during a performance test instead of Method 9.

		<ul style="list-style-type: none"> • The zero and span calibration drifts must be checked at least once daily and adjusted in accordance with the requirements in 40 CFR 60.13(d). • The zero and upscale (span) calibration drifts of a COMS must be automatically, intrinsic to the opacity monitor, checked at least once daily. • Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CMS shall be in continuous operation and shall meet minimum frequency of operation requirements as specified in 40 CFR 60.13(e). • All CMS or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. CMS shall be located and installed in accordance with the requirements in 40 CFR 60.13(f) and (g). • Data shall be reduced and computed in accordance with the procedures in 40 CFR 60.13(h), (i), and (j).
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2.16 NESHAP 40 CFR 63, Subpart A – Summary of General Provisions

Table 2.2 NESHAP 40 CFR 63, Subpart A—Summary of General Provisions

Section	Subject	Summary of Section Requirements
63.13	Address	<ul style="list-style-type: none"> • <u>All requests, reports, applications, submittals, and other communications associated with 40 CFR 63, Subpart(s) shall be submitted to:</u> Pocatello Regional Office 444 Hospital Way, #300 Pocatello, ID 83201 US EPA 1200 Sixth Avenue Seattle, WA 98101
63.4(a)	Prohibited Activities	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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 2.2 NESHAP 40 CFR 63, Subpart A—Summary of General Provisions (continued)

Section	Subject	Summary of Section Requirements
63.6(e) and (f)	Compliance with Standards and Maintenance Requirements (Non-Opacity)	<ul style="list-style-type: none"> • At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions in accordance with 40 CFR 63.6(e). • The permittee of an affected source must develop a written startup, shutdown, and malfunction plan and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard in accordance with 40 CFR 63.6(e). The permittee must maintain the current plan at the affected source and must make the plan available upon request. If the plan fails to address or inadequately addresses a malfunction, the permittee must revise the plan within 45 days after the event • The permittee must record and report actions taken during a startup, shutdown, or malfunction in accordance with the requirements in 40 CFR 63.6(e). The permittee shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the plan in the semiannual startup, shutdown, and malfunction report. • Non-opacity emission standards shall apply at all times except during periods of startup, shutdown, and malfunction, and as otherwise specified, in accordance with 40 CFR 63.6(f).
63.6(h)	Compliance with Standards and Maintenance Requirements (Opacity)	<ul style="list-style-type: none"> • The opacity and visible emission standards must apply at all times except during periods of startup, shutdown, and malfunction, and as otherwise specified in accordance with 40 CFR 63.6(h). • The permittee shall notify in writing of the anticipated date for conducting opacity or visible emission observations in accordance with 40 CFR 63.9(f), if such observations are required, in accordance with 40 CFR 63.6(h)(4). • For the purpose of demonstrating initial compliance, opacity or visible emission observations shall be conducted in accordance with 40 CFR 63.6(h)(5). • The permittee shall make records available upon request and shall provide evidence indicating proof of current visible observer emission certification in accordance with 40 CFR 63.6(h)(6).
63.6(h)(7)	Methods for Determining Compliance (CMS)	<ul style="list-style-type: none"> • The permittee shall record the monitoring data produced during a performance test and shall furnish a written report of the monitoring results in accordance with 40 CFR 63.6(h)(7). • The permittee may submit, for compliance purposes, COMS data results produced during any performance test required in lieu of Method 9 data in accordance with 40 CFR 63.6(h)(7). • For the purposes of determining compliance with the opacity emission standard during a required performance test using COMS data, the COMS data shall be reduced to 6-minute averages over the duration of the mass emission performance test. • The permittee of an affected source using a COMS for compliance purposes is responsible for demonstrating that he/she has complied with the performance evaluation requirements of 40 CFR 63.8(e), that the COMS has been properly maintained, operated, and data quality-assured, as specified in 40 CFR 63.8(c) and 40 CFR 63.8(d), and that the resulting data have not been altered in any way. • Except as provided, the results of continuous monitoring by a COMS that indicate that the opacity at the time visual observations were made was not in excess of the emission standard are probative but not conclusive evidence of the actual opacity of an emission, provided that the affected source proves that, at the time of the alleged violation, the instrument used was properly maintained, as specified in 40 CFR 63.8(c), and met Performance Specification 1 in appendix B of part 60 of this chapter, and that the resulting data have not been altered in any way.

Table 2.2 NESHAP 40 CFR 63, Subpart A—Summary of General Provisions (continued)

Section	Subject	Summary of Section Requirements
63.7	Performance Testing Requirements	<ul style="list-style-type: none"> • If required to do performance testing, the permittee must perform such tests within 180 days of the compliance date in accordance with 40 CFR 63.7(a). • The permittee must notify in writing of the intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin to allow review of the site-specific test plan and to have an observer present during the test in accordance with 40 CFR 63.7(b). • Before conducting a required performance test, the permittee shall develop and, if requested, shall submit a site-specific test plan for approval in accordance with 40 CFR 63.7(c). The test plan shall include a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program. • If required to do performance testing, the permittee shall provide performance testing facilities in accordance with 40 CFR 63.7(d): <ul style="list-style-type: none"> Sampling ports adequate for test methods applicable to such source. Safe sampling platform(s); Safe access to sampling platform(s); Utilities for sampling and testing equipment; and Any other facilities deemed necessary for safe and adequate testing of a source. • Performance tests shall be conducted and data reduced in accordance with 40 CFR 63.7(e) and (f). • The permittee shall report the results of the performance test before the close of business on the 60th day following the completion of the test, unless specified or approved otherwise in accordance with 40 CFR 63.7(g).
63.8	Monitoring Requirements (CMS)	<ul style="list-style-type: none"> • All CMS must be installed such that representative measures of emissions or process parameters from the affected source are obtained. CMS must be located and installed in accordance with the requirements in 40 CFR 63.8(b) and (c)(2). • The permittee shall maintain and operate each CMS as specified and in a manner consistent with good air pollution control practices in accordance with 40 CFR 63.8(c)(1). • All CMS shall be installed, operational, and the data verified as specified either prior to or in conjunction with conducting performance tests required by 40 CFR 63.7 in accordance with 40 CFR 63.8(c)(3). • Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero and high-level calibration drift adjustments, all CMS shall be in continuous operation and shall meet minimum frequency of operation requirements as specified in 40 CFR 63.8(c)(4). • Minimum procedures for COMS shall include the methods and procedures specified in 40 CFR 63.8(c)(5). • The permittee of a CMS that is not a CPMS must check the zero and high-level calibration drifts at least once daily and must adjust the zero and high-level calibration drift in accordance with 40 CFR 63.8(c)(6). • The CPMS must be checked daily for indication that the system is responding in accordance with 40 CFR 63.8(c)(6). • When the CMS is out of control, the permittee shall take the necessary corrective action and shall repeat all necessary tests which indicate that the system is out of control in accordance with 40 CFR 63.8(7). • The permittee of a CMS that is out of control shall submit all information concerning out-of-control periods, including start and end dates and hours and descriptions of corrective actions taken, in the excess emissions and continuous monitoring system performance report. • The permittee of an affected source that is required to use a CMS and is subject to the monitoring requirements of this section and a relevant standard shall develop and implement a CMS quality control program in accordance with 40 CFR 63.8(d).

Table 2.2 NESHAP 40 CFR 63, Subpart A—Summary of General Provisions (continued)

Section	Subject	Summary of Section Requirements
63.8	Monitoring Requirements (CMS)	<ul style="list-style-type: none"> • When required, the permittee of an affected source being monitored shall conduct a performance evaluation of the CMS in accordance with 40 CFR 63.8(e). The permittee shall provide written notification of the date of the performance evaluation simultaneously with the notification of the performance test date required in 40 CFR 63.7(b) or at least 60 days prior to the date the performance evaluation is scheduled to begin if no performance test is required. • Before conducting a required CMS performance evaluation, the permittee of an affected source shall develop and submit a site-specific performance evaluation test plan for approval upon request in accordance with 40 CFR 63.8(e). The performance evaluation test plan shall include the evaluation program objectives, an evaluation program summary, the performance evaluation schedule, data quality objectives, and both an internal and external QA program. • The permittee of an affected source shall submit the site-specific performance evaluation test plan at least 60 days before the performance test or performance evaluation is scheduled to begin, or on a mutually agreed upon date in accordance with 40 CFR 63.8(e). • The permittee shall conduct a performance evaluation during any performance test required in 40 CFR 63.7 in accordance with 40 CFR 63.8(d)(4). If a performance test is not required, the permittee of an affected source shall conduct the performance evaluation not later than 180 days after the appropriate compliance date. • The permittee shall furnish a copy of a written report of the results of the performance evaluation simultaneously with the results of the performance test required in 40 CFR 63.7 or within 60 days of completion of the performance evaluation if no test is required, unless otherwise specified in accordance with 40 CFR 63.8(d)(5). • The permittee of an affected source using a COMS to determine opacity compliance during any performance test required in 40 CFR 63.7 shall furnish copies of a written report of the results of the COMS performance evaluation in accordance with 40 CFR 63.8(d)(5). The copies shall be provided at least 15 calendar days before the performance test is conducted. • The permittee of each CMS must reduce the monitoring data as specified in 40 CFR 63.8(g).

Table 2.2 NESHAP 40 CFR 63, Subpart A—Summary of General Provisions (continued)

Section	Subject	Summary of Section Requirements
63.9	Notification Requirements	<ul style="list-style-type: none"> • The permittee of an affected source that has an initial startup before the effective date of a relevant standard shall notify in writing that the source is subject to the relevant standard, in accordance with 40 CFR 63.9(b)(2). The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information: <ul style="list-style-type: none"> The name and address of the permittee; The address (i.e., physical location) of the affected source; An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date; A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and A statement of whether the affected source is a major source or an area source. • The permittee of a new or reconstructed major affected source for which an application for approval of construction or reconstruction is required must provide the following information in writing in accordance with 40 CFR 63.9(b)(4): <ul style="list-style-type: none"> A notification of intention to construct a new major-emitting affected source, reconstruct a major-emitting affected source, or reconstruct a major source such that the source becomes a major-emitting affected source; A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date. • The permittee of a new or reconstructed affected source for which an application for approval of construction or reconstruction is not required must provide the following information in writing in accordance with 40 CFR 63.9(b)(5): <ul style="list-style-type: none"> A notification of intention to construct a new affected source, reconstruct an affected source, or reconstruct a source such that the source becomes an affected source, and A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date. <p>Unless the permittee has requested and received prior permission, the notification must include the information required in the application for approval of construction or reconstruction as specified in 40 CFR 63.5(d)(1).</p>

Table 2.2 NESHAP 40 CFR 63, Subpart A—Summary of General Provisions (continued)

Section	Subject	Summary of Section Requirements
63.9	Notification Requirements	<ul style="list-style-type: none"> • The permittee shall notify in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin to allow the opportunity to review and approve the site-specific test plan required by 40 CFR 63.7(c), and to have an observer present during the test. • The permittee of an affected source shall notify in writing of the anticipated date for conducting the opacity or visible emission observations in accordance with 40 CFR 63.9(f), if such observations are required. • Each time a notification of compliance status is required under this part, the permittee of such source shall submit a notification of compliance status in accordance with 40 CFR 63.9(h)(2)(i). The notification shall list: <ul style="list-style-type: none"> The methods that were used to determine compliance; The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted; The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods; The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard; If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification); A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and A statement by the permittee of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements. • The notification must be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard unless otherwise specified in accordance with 40 CFR 63.9(h)(2)(ii). If no performance test is required but opacity or visible emission observations are required to demonstrate compliance with a standard, the notification shall be sent before close of business on the 30th day following the completion of the observations. • Each time a notification of compliance status is required under this part, the permittee of such source shall submit the notification of compliance status following completion of the relevant compliance demonstration activity specified. • If an permittee submits estimates or preliminary information in an application in place of the actual emissions data or control efficiencies, the permittee shall submit the actual emissions data and other correct information as soon as available but no later than with the initial notification of compliance status required in this section in accordance with 40 CFR 63.9(h)(5). • Any change in the information already provided under this section shall be provided in writing within 15 calendar days after the change in accordance with 40 CFR 63.9(j).
63.9(g)	Additional Notification Requirements (CMS)	<ul style="list-style-type: none"> • The permittee of an affected source required to use a CMS shall furnish written notification as follows in accordance with 40 CFR 63.9(g): <ul style="list-style-type: none"> A notification of the date the CMS performance evaluation is scheduled to begin, submitted simultaneously with the notification of the performance test date. If no performance test is required, the permittee shall notify in writing of the date of the performance evaluation at least 60 calendar days before the evaluation is scheduled to begin; and A notification that COMS data results will be used to determine compliance with the applicable opacity emission standard during a performance test in lieu of Method 9 or other opacity emissions test method data, as allowed by 40 CFR 63.6(h)(7)(ii), if compliance with an opacity emission standard is required for the source by a relevant standard. The notification shall be submitted at least 60 calendar days before the performance test is scheduled to begin.

Table 2.2 NESHAP 40 CFR 63, Subpart A—Summary of General Provisions (continued)

Section	Subject	Summary of Section Requirements
63.10	Recordkeeping and Reporting Requirements	<ul style="list-style-type: none"> • 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); <ul style="list-style-type: none"> 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); Each period during which a CMS is malfunctioning or inoperative (including out-of-control periods); All required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report); All results of performance tests, CMS performance evaluations, and opacity and visible emission observations; All measurements as may be necessary to determine the conditions of performance tests and performance evaluations; All CMS calibration checks; All adjustments and maintenance performed on CMS; All emission levels relative to the criterion for obtaining permission to use an alternative to the relative accuracy test, if the source has been granted such permission under 40 CFR 63.8(f)(6); and All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9. • 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).

Table 2.2 NESHAP 40 CFR 63, Subpart A—Summary of General Provisions (continued)

Section	Subject	Summary of Section Requirements
63.10(b) and (c)	Additional Recordkeeping Requirements (CMS)	<ul style="list-style-type: none"> • In lieu of maintaining a file of all CEMS subhourly measurements, the permittee shall retain the most recent consecutive three averaging periods of subhourly measurements and a file that contains a hard copy of the data acquisition system algorithm used to reduce the measured data in accordance with 40 CFR 63.10(b)(2). • In lieu of maintaining a file of all CEMS subhourly measurements, the permittee shall retain all subhourly measurements for the most recent reporting period. The subhourly measurements shall be retained for 120 days from the date of the most recent summary or excess emission report submitted. • The permittee shall maintain records for each affected source of— <ul style="list-style-type: none"> All required CMS measurements The date and time identifying each period during which the CMS was inoperative except for zero and high-level checks; The date and time identifying each period during which the CMS was out of control; The specific identification of each period of excess emissions and parameter monitoring exceedances, that occurs during startups, shutdowns, and malfunctions of the affected source; The specific identification of each time period of excess emissions and parameter monitoring exceedances, that occurs during periods other than startups, shutdowns, and malfunctions of the affected source; The nature and cause of any malfunction; The corrective action taken or preventive measures adopted; The nature of the repairs or adjustments to the CMS that was inoperative or out of control; The total process operating time during the reporting period; and All procedures that are part of a quality control program developed and implemented for CMS.

Incorporation of Federal Requirements by Reference

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

- Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60, Subpart Dc, Subpart Ce, and Subpart IIII
- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63, Subpart ZZZZ, Subpart CCCCCC, Subpart HHHHHH, and Subpart JJJJJJ.

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[IDAPA 58.01.01.107.03; 2/6/2014]

40 CFR 63 Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

2.18 Engine No. 7 is applicable to 40 CFR 63 Subpart ZZZZ and shall comply with these federal regulations.

[7/30/2020]

3 Boiler No. 2

3.1 Process Description

Boiler No. 2 has a rated capacity of 23 MMBtu/hr and is fired exclusively with natural gas. The boiler is not subject to NSPS because it was constructed in 1947 and was not modified or reconstructed after the promulgated date of the NSPS rules in 6/9/1989.

It should be noted that ISU will no longer use coal as an alternative fuel in the boiler. Consequently, the boiler exhaust baghouse previously used to control coal-burning particulate emissions is decommissioned.

3.2 Control Device Descriptions

Table 3.1 Boiler No. 2 Description

Emissions Units / Processes	Control Devices	Emission Points
Boiler No. 2	None	Boiler No. 2 Stack

Operating Requirements

3.3 Natural Gas Throughput Limits

Boiler No. 2 shall burn no more than 32.5 MMscf per any consecutive 12-month period.

[8/2/2006]

3.4 Fuel Type

Boiler No. 2 shall be fired on natural gas exclusively.

[2/6/2014]

Monitoring and Recordkeeping Requirements

3.5 Natural Gas Throughput Monitoring

The permittee shall monitor and record the amount, in million standard cubic feet, of natural gas burned in Boiler No. 2, each month and for the most recent 12-month period.

[8/2/2006]

4 Boiler No. 3

4.1 Process Description

Boiler No. 3 is used for steam generation, is fired exclusively with natural gas, and has a rated capacity of 26.92 MMBtu/hr. The boiler is not subject to NSPS because it was constructed in 1957 and was not modified or reconstructed after the promulgated date of the NSPS rules in 6/9/1989.

4.2 Control Device Descriptions

Table 4.1 Boiler No. 3 Description

Emissions Units / Processes	Control Devices	Emission Points
Boiler No. 3	None	Boiler No. 3 Stack

Operating Requirements

4.3 Natural Gas Throughput Limits

Boiler No. 3 shall burn no more than 203 MMscf per any consecutive 12-month period.

[2/6/2014]

4.4 Fuel Type

Boiler No. 3 shall be fired on natural gas exclusively.

[2/6/2014]

Monitoring and Recordkeeping Operating Requirements

4.5 Natural Gas Throughput Monitoring

The permittee shall monitor and record the amount, in million standard cubic feet, of natural gas burned in Boiler No. 3, each month and for the most recent 12-month period. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representative upon request.

[8/2/2006]

5 Boiler No. 4

5.1 Process Description

Boiler No. 4 is used for steam generation. The rated capacity of the boiler is 72.84 MMBtu/hr and it is fired on natural gas. The boiler also has the potential capability to burn diesel fuel. The boiler is subject to NSPS, 40 CFR 60 Subpart Dc.

The permittee requested the option of firing the boiler with diesel as emergency fuel in the event that natural gas supply to the campus is disrupted. In the event of the loss of natural gas, a diesel tanker truck could be called in to park outside the Heat Plant building at the campus and supply fuel to Boiler No. 4. Fuel would be pumped at a maximum rate of 400 gallons per hour. The permittee is requesting an annual diesel limit of 75,000 gallons.

[2/6/2014]

5.2 Control Device Descriptions

Table 5.1 Boiler No. 4 Description

Emissions Units / Processes	Control Devices	Emission Points
Boiler No. 4	Coen low-NO _x Burner	Boiler No. 4 Stack

Emission Limits

5.3 40 CFR 60 Subpart D_C, PM limits when burning No. 2 fuel oil

On or after the date on which the initial performance test is required to be completed under 40 CFR 60.8 for steam generating units constructed or modified on or after February 28, 2005 particulate matter emissions shall not be in excess of 0.030 lb/MMBtu heat input in accordance with 40 CFR 60.43c(e)(1).

As an alternative to meeting the requirements of paragraph (e)(1) of this section, the owner or operator of an affected facility for which modification commenced after February 28, 2005, may elect to meet the requirements of this paragraph. On and after the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, whichever date comes first, no owner or operator of an affected facility that commences modification after February 28, 2005 shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of both:

- 0.051 lb/MMBtu) heat input derived from the combustion of oil; and
- 0.2 percent of the combustion concentration (99.8 percent reduction) when combusting oil.

[2/6/2014]

5.4 40 CFR 60 Subpart D_C, SO₂ limits when burning No. 2 fuel oil

In accordance with 40 CFR 60.42c(d) and on and after the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contains SO₂ in excess of 0.50 lb/MMBtu heat input from oil; or, as an alternative, no owner or operator of an affected facility that combust oil in the affected facility that contains greater than 0.5 weight percent sulfur.

[2/6/2014]

5.5 40 CFR 60 Subpart Dc, Opacity limit when burning No. 2 fuel oil

- In accordance with 40 CFR 60.43c(c), the permittee shall not discharge into the atmosphere from the Boiler No. 4 stack any gases that exhibit greater than 20% opacity (six-minute average), except for one six-minute period per hour of not more than 27% opacity.
- In accordance with 40 CFR 60.43c(d), the PM and opacity standards under 40 CFR 60.43c shall apply at all times, except during periods of startup, shutdown, or malfunction.

Opacity shall be determined by the procedures specified in 40 CFR Part 60.47c.

[2/6/2014]

Operating Requirements

5.6 Natural Gas and Diesel Fuel Oil Throughput Limits

- The amount of natural gas used by Boiler No. 4 shall not exceed 498 MMscf per any consecutive 12-month period.
- The amount of diesel fuel used by Boiler No. 4 shall not exceed 75,000 gallons per any consecutive 12-month period. Diesel fuel shall be used by Boiler No. 4 only in emergency situations and during natural gas supply disruption to the campus.

[2/6/2014]

5.7 Fuel Type

Boiler No. 4 shall be fired on natural gas exclusively except in emergency situations (i.e., during natural gas disruption to the campus and limited periodic testing – see Permit Condition 5.8), the boiler shall be fired on diesel fuel.

[2/6/2014]

5.8 40 CFR 60 Subpart JJJJJJ, Hour of operation limits when burning No. 2 fuel oil

In accordance with 40 CFR 63.11237, any periodic testing of diesel fuel oil shall not exceed a combined total of 48 hours during any calendar year.

[2/6/2014]

Monitoring and Recordkeeping Requirements

5.9 Throughput Monitoring

- 40 CFR 60 Subpart Dc, Fuel Monitoring
The permittee shall monitor and maintain records of the amount of natural gas combusted in Boiler No. 4 each day in accordance with 40 CFR 60.48c(g)(1), or the permittee may elect to record and maintain records of the amount of fuel combusted during each calendar month in accordance with 40 CFR 60.48c(g)(2); or to record and maintain records of the total amount of natural gas delivered to that property during each calendar month in accordance with 40 CFR 60.48c(g)(3).
- The permittee shall monitor and record the amount of natural gas combusted in Boiler No. 4 each month and for the most recent 12-month period to determine compliance with Permit Condition 5.6. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representative upon request.
- The permittee shall monitor and record the annual amount of diesel fuel oil combusted in Boiler No. 4 when it is used for emergency purposes to determine compliance with Permit

Condition 5.6. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representative upon request.

- The permittee shall monitor and maintains records of the annual hours of periodic testing on Boiler No. 4 when operating on diesel fuel.

[2/6/2014]

5.10 40 CFR 60 Subpart D_C, Compliance and Performance Test Methods

In accordance with 40 CFR 60.45c(a), the operator of an affected facility shall conduct an initial performance test as required under 40 CFR 60.8, after startup with diesel fuel to demonstrate compliance with the particulate matter standards of 40 CFR 60.43c (i.e., Permit Condition 5.3).

[2/6/2014]

6 Pathological Waste Incinerator

6.1 Process Description

The purpose of the incinerator is to incinerate preserved animal tissue and cadavers which were used for educational purposes. The incinerator is designed as a two-stage system with a primary combustion chamber and a secondary combustion chamber.

6.2 Control Device Descriptions

Table 6.1. Pathological Waste Incinerator Description

Emissions Units / Processes	Control Devices	Emission Points
Pathological Waste Incinerator	Secondary combustion chamber	Incinerator stack

Emission Limits

6.3 Particulate Emission Limits

No person shall allow, suffer, cause or permit any incinerator to discharge more than 0.2 pounds of particulates per 100 pounds of refuse burned.

[8/2/2006]

Operating Requirements

6.4 Material Incinerated

The incinerator shall be used to incinerate pathological waste only. Pathological waste is defined as waste material consisting of only human or animal remains, anatomical parts, and/or tissue, the bags/containers used to collect and transport the waste material and animal bedding (if applicable).

[8/2/2006]

6.5 Throughput Limits

The maximum throughput of the incinerator shall not exceed 500 pounds per batch or 75 tons per any consecutive 12-month period. The average burn rate shall not exceed 100 pounds per hour per batch.

[8/2/2006]

6.6 Continuous Temperature Monitor

A continuous temperature monitoring and recording device shall be operated for the secondary combustion chamber. A compilation of the most recent five years of temperature records shall be kept on site and shall be made available to DEQ representatives upon request.

[8/2/2006]

6.7 Secondary Chamber Operating Temperature

The secondary combustion chamber shall operate at an average hourly temperature of at least 1600°F for the combustion cycle and for at least ½ hour after the end of the combustion cycle.

[8/2/2006]

Monitoring and Recordkeeping Requirements

6.8 Throughput

The permittee shall record the amount, in pounds, and type of material charged into the incinerator for each batch incinerated. The permittee shall record the time that each batch was charged into the incinerator and the period of time set for the combustion cycle. The permittee shall calculate the average amount of material burned per hour for each batch using the combustion cycle time and the total weight of material burned per batch. Each month, the permittee shall compile the records of the amount of material charged into a rolling sum for the most recent 12-month period. A compilation of the most recent five years of records shall be kept on site and shall be made available to DEQ representatives upon request.

[8/2/2006]

6.9 Operations and Maintenance Manual Requirements

The permittee shall have developed and submitted to DEQ an Operation and Maintenance (O&M) manual for the incinerator. The manual shall describe the procedures that will be followed to comply with the manufacturer specifications. A copy of this manual shall remain onsite at all times. A copy of this manual shall also be submitted to the DEQ regional office at the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Pocatello Regional Office
444 Hospital Way, #300
Pocatello, ID 83201

[8/2/2006]

7 Standards of Performance for New Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) – 40 CFR 60 Subpart III

7.1 Process Description

ISU has nine emergency generator engines (No. 1 through No. 9) with various capacities at the Pocatello campus. Seven of which (i.e., Nos. 2, 4, 5, 6, 7, 8, and 9) are powered by diesel fuel oil; the rest (i.e., Nos. 1 and 3) are powered by natural gas fuel.

Generators Nos. 1-4 were included in Table 1.2 (Other Air Pollution Sources at the Facility) in the Permit No. T2-030317, issued August 2, 2006. Generator engines Nos. 5-9 were installed since 2006 and were exempt from a PTC, pursuant to IDAPA 58.01.01.222.01.d. Exemption documentations for the generator engines Nos. 5-9 are provided in Appendix B of the PTC application No. P-2013.0015, received on March 1, 2013.

This section of the permit addresses the requirements of Subpart III that are applicable to the emergency engines Nos. 6-9.

[2/6/2014]

7.2 Control Device Descriptions

Table 7.1. Emergency Generator Engines Nos. 6, 7, 8, and 9 Descriptions

Emissions Units / Processes	Control Devices	Emission Points
Emergency Generator Engines	None	Generator Engines' Stacks

[2/6/2014]

7.3 NSPS Subpart III – General Provisions

The permittee shall comply with 40 CFR 60 Subpart III-Standards of Performance for New Stationary Compression Ignition (CI) Internal Combustion Engines (ICE), as applicable, and all applicable general provisions of 40 CFR 60 Subpart A.

[2/6/14]

7.4 NSPS Subpart III, 40 CFR 60.4207 – Fuel Requirements

In accordance with 40 CFR 60.4207(a), fuel purchased on or after October 1, 2010 for use in the stationary CI ICE shall meet the following per-gallon standard [derived from 40 CFR 80.510(b), which is incorporated by reference into 40 CFR 60.4207(a)]:

- (1) Sulfur content.
 - (i) 15 ppm maximum for Nonroad (NR) diesel fuel.
- (2) Cetane index or aromatic content, as follows:
 - (i) A minimum cetane index of 40; or
 - (ii) A maximum aromatic content of 35 volume percent.

[2/6/2014]

7.5 NSPS Subpart III, 40 CFR 60.4211 – Compliance Requirements

- In accordance with 40 CFR 60.4211(a), the permittee must operate and maintain the stationary CI ICE and control device according to the manufacturer's emission-related written instructions. In addition, owners and operators change only those emission-related settings

that are permitted by the manufacturer. The permittee must also meet the requirements of 40 CFR parts 89, and/or 1068, as they apply to you.

- In accordance with 40 CFR 60.4211(c) the permittee must comply by purchasing an engine certified to the emission standards in §60.4205(b). The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in §60.4211(g).
- In accordance with 40 CFR 60.4211(f) emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by federal, state, or local government, the manufacturer, the vendor, or the insurance company associated with the engine.
 - Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of emergency stationary ICE in emergency situations.
 - The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per year.
 - Emergency stationary ICE may operate up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply non-emergency power as part of a financial arrangement with another entity.
 - For owners and operators of emergency engines, any operation other than emergency operation, maintenance and testing, and operation in nonemergency situations for 50 hours per year, as permitted in this section, is prohibited.

[2/6/2014]

7.6 NSPS Subpart III, 40 CFR 60.4209 – Monitoring Requirements

In accordance with 40 CFR 60.4209(a) the emergency stationary CI ICE shall have a non-resettable hour meter installed prior to startup of the engine.

[2/6/2014]

7.7 NSPS Subpart III, 40 CFR 60.4218, General Provisions to NSPS 40 CFR 60 Subpart A

- The permittee is not required to submit an initial notification as required in 40 CFR 60.7(a)(1) of Subpart A for the emergency stationary CI ICE, in accordance with 40 CFR 60.4214(b).
- The permittee shall comply with Table 8 to Subpart III of Part 60-Applicability of General Provisions to Subpart III.

[2/6/2014]

8 National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities – 40 CFR 63 Subpart CCCCCC

8.1 Process Description

The primary purpose of the gasoline dispensing operation is to dispense gasoline from the storage tank into motor vehicles, heavy equipment, and lawn equipment at the campus.

Operating Requirements

8.2 NESHAP Subpart CCCCCC - Gasoline Throughput Limit and the affected sources

- In accordance with 40 CFR 63.11111, for compliance with NESHAP Subpart CCCCCC, gasoline throughput from the gasoline storage tank shall not exceed 10,000 gallons per month.
- In accordance with 40 CFR 63.11111, if the affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold.
- In accordance with 40 CFR 63.11112, the emission sources to which this subpart applies are gasoline storage tanks and associated equipment components in vapor or liquid gasoline service at existing gasoline dispensing facilities (GDF) that meet the criteria specified in § 63.11111. Pressure/Vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at GDF are covered emission sources.

[2/6/2014]

8.3 NESHAP Subpart CCCCCC - General Duties to Minimize Emissions Requirements

In accordance with 40 CFR 63.11115(a), the permittee must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[2/6/2014]

8.4 NESHAP Subpart CCCCCC - General Duties to Minimize Emissions Requirements

In accordance with 40 CFR 63.11116(a), the permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:

- Minimize gasoline spills;
- Clean up spills as expeditiously as practicable;
- Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
- Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

[2/6/2014]

8.5 NESHAP Subpart CCCCCC - Compliance Date

In accordance with 40 CFR 63.11113 and 40 CFR 63.11116(c), the permittee shall comply with the standards in this subpart no later than January 10, 2011.

[2/6/2014]

Monitoring and Recordkeeping Requirements

8.6 NESHAP Subpart CCCCCC - Air Pollution and Monitoring Equipment Malfunction Recordkeeping

In accordance with 40 CFR 63.11115(b) and 40 CFR 63.11125(d), the Permittee shall keep records as specified below:

- Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.11115(a), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[2/6/2014]

8.7 NESHAP Subpart CCCCCC - Gasoline Throughput Recordkeeping

In accordance with 40 CFR 63.11111(e), the permittee shall monitor and record monthly throughput of gasoline from the gasoline storage tank to demonstrate compliance with the NESHAP Subpart CCCCCC Gasoline Throughput Limit permit condition. Records required under this paragraph shall be kept for a period of five years.

[2/6/2014]

8.8 NESHAP Subpart CCCCCC - Gasoline Throughput Records Availability

In accordance with 40 CFR 63.11116(b), the permittee is not required to submit notifications or reports as specified in §63.11125, §63.11126, or subpart A of this part, the permittee must have records available within 24 hours of a request by the Administrator to document gasoline throughput.

[2/6/2014]

Reporting Requirements

8.9 NESHAP Subpart CCCCCC - Air Pollution and Monitoring Equipment Malfunction Reporting Requirements

In accordance with 40 CFR 63.11115(b) and 40 CFR 63.11126(b), the permittee shall report, by March 15 of each year, the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.11115(a), including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred.

[2/6/2014]

Incorporation of Federal Requirements by Reference

8.10 Incorporation of Federal Requirements by Reference

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

- National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart CCCCCC – Gasoline Dispensing Facilities

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[IDAPA 58.01.01.107.03]

- 8.11** The permittee shall comply with the requirements of 40 CFR 63 Subpart A – General Provisions.
[2/6/2014]

9 Paint Booths Nos. 1, 2, and 3

Paint Booth Nos. 1 and 2 (Automotive Shop):

9.1 Process Description

Two automotive part coating spray booths, paint booths 1 and 2, located in the Technology Building (Building 48) at ISU are used by students in the automotive curriculum. Each booth is equipped with an exhaust fan which discharges through separate roof stacks. Coatings are applied with High Volume Low Pressure (HVLP) spray guns with a minimum 65% transfer efficiency.

Paint Booths Nos. 1 and 2 are subject to 40 CFR 63, Subpart HHHHHH.

The process description for Paint Booth No. 3 is shown below (see section 9.14); and the booth is not subject to 40 CFR 63, Subpart HHHHHH.

[2/6/2014]

9.2 Control Device Descriptions

The spray booths are equipped with overspray filters that have filtration efficiencies of greater than 99%, each.

Table 9.1. Paint Booths Nos. 1 & 2 Description.

Emissions Units / Processes	Control Devices	Emission Points
Paint booth No. 1	Overspray filter – Manufacturer: GFS Wave Media filter or equivalent; Model: FL-ERP or equivalent Coating spray gun(s): Manufacturer: ANEST IWATA, Sata Jet, Devil Bliss or equivalent; transfer efficiency: 65%	Paint booth No. 1 stack
Paint booth No. 2	Overspray filter– Manufacturer: GFS Wave Media filter or equivalent; Model: FL-ERP or equivalent Coating spray gun(s): Manufacturer: ANEST IWATA, Sata Jet, Devil Bliss or equivalent; transfer efficiency: 65%	Paint booth No. 2 stack

Operating Requirements

9.3 Coating Materials Use Limit

The combination of all coating materials used in the automotive coating in paint booths Nos. 1 and 2 processes, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, thinner/reducer, and undercoating coatings shall not exceed 5.0 gallons per booth per calendar day and 1,000 gallons per booth per any consecutive 12-month period.

[2/6/2014]

9.4 Prohibition from Using MeCl to Remove Paint

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

[2/6/2014]

9.5 Spray Gun and Spray Booth(s) Filter System

- All painting at this facility, including application of primer and application of undercoating coatings, shall be conducted inside the booth(s) or preparation station(s) with filter system in place, exhaust fan(s) operating, and door(s) or curtain(s) closed. For complete vehicles the booth must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in

the booth walls or side curtains. For coating miscellaneous parts and products or vehicle subassemblies the preparation station must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the preparation station.

- All painting shall be conducted with a HVLP spray gun, or equivalent technology, with a minimum 65% transfer efficiency as documented by the spray gun manufacturer.
- The permittee shall install, maintain, and operate according to the manufacturer's specifications and recommendations, a spray booth filter system or a preparation station filter system with a minimum control efficiency of 98% for PM₁₀ emissions as documented by the filter manufacturer.

[2/6/2014]

Monitoring and Recordkeeping Requirements

9.6 Material Purchase Records and Material Safety Data Sheet

For each material used in the automotive coating process, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, and thinner/reducer, and undercoating coatings, the permittee shall record and maintain the following records:

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

[2/6/2014]

9.7 Coating Materials Usage Recordkeeping

When the automotive coating process is in operation the permittee shall collect and maintain records of the following information to demonstrate compliance with the Coating Materials Use Limit permit condition:

- On a calendar day basis, the quantity of each material used in the automotive coating process, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, and thinner/reducer, and undercoating coatings.

[2/6/2014]

9.8 Recordkeeping

The permittee shall comply with the recordkeeping General Provision requirements.

[2/6/2014]

Monitoring and Recordkeeping Requirements

9.9 Material Purchase Records and Material Safety Data Sheet

For each material used in the automotive coating process, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, and thinner/reducer, and undercoating coatings, the permittee shall record and maintain the following records:

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

[2/6/2014]

Monitoring and Recordkeeping Requirements

9.10 Material Purchase Records and Material Safety Data Sheet

For each material used in the automotive coating process, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, and thinner/reducer, and undercoating coatings, the permittee shall record and maintain the following records:

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

[2/6/2014]

9.11 Coating Materials Usage Recordkeeping

When the automotive coating process is in operation the permittee shall collect and maintain records of the following information to demonstrate compliance with the Coating Materials Use Limit permit condition:

- On a calendar day basis, the quantity of each material used in the automotive coating process, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, and thinner/reducer, and undercoating coatings.

[2/6/2014]

9.12 Recordkeeping

The permittee shall comply with the recordkeeping General Provision requirements.

[2/6/2014]

National Emission Standards for Hazardous Air Pollutants for Source Category: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources – 40 CFR 63, Subpart HHHHHH Requirement Requirements

9.13 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, General Compliance Requirements

Unless an exemption from the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2), in accordance with 40 CFR 63.11172(a)(2), on and after January 10, 2011 the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- The permittee shall meet the requirements of 40 CFR 63.11173(e)(1). All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in 40 CFR 63.11173(f). The spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in 40 CFR 63.11173(f). The requirements of this paragraph do not apply to the students of an accredited surface coating training program who are under the direct supervision of an instructor who meets the requirements of this paragraph.
- All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of 40 CFR 63.11173(e)(2).

- All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98% capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1.
- Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.
- Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.
- All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, or air-assisted airless spray gun, in accordance with 40 CFR 63.11173(e)(3).
- All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent, in accordance with 40 CFR 63.11173(e)(4). Spray gun cleaning may be done by using a fully enclosed spray gun washer.
- Each owner or operator must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, are trained in the proper application of surface coatings as required by 40 CFR 63.11173(e)(1), in accordance with 40 CFR 63.11173(f). The training program must include, at a minimum:
 - A list of all current personnel by name and job description who are required to be trained;
 - Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:
 - Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate;
 - Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke;
 - Routine spray booth and filter maintenance, including filter selection and installation; and
 - Environmental compliance with the requirements of 40 CFR 63, Subpart HHHHHH.

- A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required are not required to provide the initial training to these painters.
- All new and existing personnel at the facility, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, must be trained by the dates specified in 40 CFR 63.11173(g). Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.
 - All personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in 40 CFR 63.11173(f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
 - Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.
- The parts of the General Provisions which apply to the permittee are specified in Table 9.2, in accordance with 40 CFR 63.11174(a).

[2/6/2014]

Table 9.2 APPLICABILITY OF GENERAL PROVISIONS TO SUBPART HHHHHH OF PART 63

Citation	Subject	Explanation
40 CFR 63.1(a)(1)-(12)	General Applicability	
40 CFR 63.1(b)(1)-(3)	Initial Applicability Determination	Applicability of subpart HHHHHH is also specified in 40 CFR 63.11170.
40 CFR 63.1(c)(1)	Applicability After Standard Established	
40 CFR 63.1(c)(2)	Applicability of Permit Program for Area Sources	
40 CFR 63.1(c)(5)	Notifications	
40 CFR 63.2	Definitions	Additional definitions are specified in 40 CFR 63.11180.
40 CFR 63.3(a)-(c)	Units and Abbreviations	
40 CFR 63.4(a)(1)-(5)	Prohibited Activities	
40 CFR 63.4(b)-(c)	Circumvention/Fragmentation	
40 CFR 63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	
40 CFR 63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	40 CFR 63.11172 specifies the compliance dates.
40 CFR 63.6(c)(1)-(5)	Compliance Dates for Existing Sources	40 CFR 63.11172 specifies the compliance dates.
40 CFR 63.6(e)(1)-(2)	Operation and Maintenance	
40 CFR 63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	
40 CFR 63.6(f)(2)-(3)	Methods for Determining Compliance	
40 CFR 63.6(g)(1)-(3)	Use of an Alternative Standard	
40 CFR 63.6(i)(1)-(16)	Extension of Compliance	
40 CFR 63.6(j)	Presidential Compliance Exemption	
40 CFR 63.9(a)-(d)	Notification Requirements	40 CFR 63.11175 specifies notification requirements.
40 CFR 63.9(i)	Adjustment of Submittal Deadlines	
40 CFR 63.9(j)	Change in Previous Information	40 CFR 63.11176(a) specifies the dates for submitting the notification of changes report.

40 CFR 63.10(a)	Recordkeeping/Reporting—Applicability and General Information	
40 CFR 63.10(b)(1)	General Recordkeeping Requirements	Additional requirements are specified in 40 CFR 63.11177.
40 CFR 63.10(b)(2)(xii)	Waiver of recordkeeping requirements	
40 CFR 63.10(b)(2)(xiv)	Records supporting notifications	
40 CFR 63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	
40 CFR 63.10(d)(1)	General Reporting Requirements	Additional requirements are specified in 40 CFR 63.11176.
40 CFR 63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	
40 CFR 63.10(f)	Recordkeeping/Reporting Waiver	
40 CFR 63.12	State Authority and Delegations	
40 CFR 63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	
40 CFR 63.14	Incorporation by Reference	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in 40 CFR 63.11173(e)(2) and (3) are incorporated and included in 40 CFR 63.14.
40 CFR 63.15	Availability of Information/Confidentiality	
40 CFR 63.16(a)	Performance Track Provisions—reduced reporting	

[2/6/2014]

9.14 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Recordkeeping

Unless an exemption from the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2), in accordance with 40 CFR 63.11172(a)(2), on and after January 10, 2011 the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- The permittee shall keep the following records in accordance with 40 CFR 63.11177(a) through (d) and (h).
 - Certification that each painter has completed the training specified in 40 CFR 63.11173(f) with the date the initial training and the most recent refresher training was completed.
 - Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in 40 CFR 63.11173(e)(2).
 - Copies of any notification submitted as required by 40 CFR 63.11175 and copies of any report submitted as required by 40 CFR 63.11176.
 - Records of any deviation from the requirements in 40 CFR 63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
 - Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.

- The permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record in accordance with 40 CFR 63.11178(a). Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.
- In accordance with 40 CFR 63.11178(a), the permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

[2/6/2014]

9.15 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Notifications

Unless an exemption from the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2), in accordance with 40 CFR 63.11172(a)(2), on and after January 10, 2011 the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

- *Initial Notification.* The permittee must submit the initial notification required by 40 CFR 63.9(b) in accordance with 40 CFR 63.11175(a). For this existing source, the permittee must submit the Initial Notification no later than January 11, 2010. The initial notification must provide the following information.
 - The company name, if applicable;
 - The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;
 - The street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - An identification of the relevant standard, such as 40 CFR part 63, Subpart HHHHHH;
 - A brief description of the type of operation. For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.
 - A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date.
 - The permittee must certify in the initial notification whether the source is in compliance with each of the requirements of 40 CFR 63, Subpart HHHHHH. If the permittee is certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.

- *Notification of Compliance Status.* The permittee is not required to submit a separate notification of compliance status in addition to the initial notification provided the permittee was able to certify compliance on the date of the initial notification as part of the initial notification, and the permittee's compliance status has not since changed in accordance with 40 CFR 63.11175(b). The permittee must submit a Notification of Compliance Status by March 11, 2011. The permittee is required to submit the following information with the Notification of Compliance Status:
 - The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
 - The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For surface coating operations, the relevant requirements are specified in 40 CFR 63.11173(e) through (g).
 - The date of the Notification of Compliance Status.

[2/6/2014]

9.16 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Reports

Unless an exemption from the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2), in accordance with 40 CFR 63.11172(a)(2), on and after January 10, 2011 the permittee shall comply with the applicable emission limitations and requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR 63, Subpart HHHHHH.

[2/6/2014]

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

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

And,

Air Quality Permit Compliance
Department of Environmental Quality
Pocatello Regional Office
444 Hospital Way #300
Pocatello, ID 83201

Phone: (208) 236-6160
Fax: (208) 236-6168

[2/6/2014]

9.17 Incorporation of Federal Requirements by Reference

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

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

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[IDAPA 58.01.01.107.03; 2/6/2014]

Paint Booth No 3 (Maintenance Shop):

9.18 Process Description

The Maintenance Shop (Building 22) contains wood working equipment used to build and repair wooden items for the campus. A variety of tools including saws, sanders, and borers are available for incidental use by maintenance staff.

To collect wood dust emissions, the tools are connected to a baghouse via a ducting system. A 5,500 cfm fan on the exhaust of the baghouse draws air from the tool area, through the baghouse and then exhausts the air above the Maintenance Shop.

One coating spray booth (Paint Booth No. 3) is also located in the Maintenance Shop (Building 22) and is used by facility staff to paint and/or finish wooden furniture and other items that are fabricated or repaired on site.

The booth is equipped with an exhaust fan which discharges through a roof stack. Coatings are applied with HPLV spray guns with a minimum 65% transfer efficiency and filters with PM control efficiency of greater than 99%.

Note: In accordance with § 63.11169(c), the maintenance shop spray booth is not subject to MACT Subpart HHHHHH since none of the coatings used at the booth contain the target HAPs (i.e., chromium, lead, manganese, nickel, or cadmium); coating are generally applied to wood surfaces, and the shop falls under the definition of *Facility maintenance* as defined in § 63.11180. [2/6/2014]

9.19 Control Device Descriptions

The spray booth is equipped and overspray filters with filtration efficiency of greater than 99%. The Maintenance Shop is equipped with a baghouse PM filtration control efficiency of 99.9%. Table 9.3 describes the Maintenance Shop and the Paint Booth No. 3.

Table 9.3. Paint Booth No. 3 Description.

Emissions Units / Processes	Control Devices	Emission Points
Paint booth No. 3	<p><u>Maintenance Shop:</u> Baghouse – Manufacturer: Murphy-rodgers; Model: MRA-17-420H equipped with 100 68-inch filter bags (MRS68); PM removal efficiency: 99.0% Overspray filter –</p> <p><u>Paint Booth:</u> <u>Manufacturer:</u> Graco or equivalent; Model: FL-ERP or equivalent Coating spray gun(s): Manufacturer: Pro-Finish CSA or equivalent; Filter Manufacturer: GFS or equivalent; Model: FL-ERP or equivalent; PM control efficiency: 99.9%; Spray gun Transfer efficiency: 65%</p>	Paint booth No. 3 stack

Operating Requirements

9.20 Coating Materials Use Limit

The combination of all coating materials used in the maintenance shop in paint booth No. 3 process, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, thinner/reducer, and undercoating coatings shall not exceed 5.0 gallons per calendar day and 500 gallons per any consecutive 12-month period.

[2/6/2014]

9.21 Prohibition from Using MeCl to Remove Paint

The permittee shall not use Methylene Chloride (MeCl) to remove paint at paint booth No. 3.

[2/6/2014]

9.22 Prohibition from Using Coatings Contain Target HAPs

The permittee shall not use coatings material at paint booth No. 3 that contain any of the target HAPs of chromium, lead, manganese, nickel, or cadmium.

[2/6/2014]

9.23 Spray Gun and Spray Booth Filter System

- All wood painting at this facility, including application of primer and application of undercoating coatings, shall be conducted inside the booth or preparation station(s) with filter system in place, exhaust fan(s) operating, and door(s) or curtain(s) closed. For complete wooden items the booth must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or side curtains. For coating miscellaneous parts and products the preparation station must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the preparation station.

- All painting shall be conducted with a HVLP spray gun, or equivalent technology, with a minimum 65% transfer efficiency as documented by the spray gun manufacturer.
- The permittee shall install, maintain, and operate according to the manufacturer's specifications and recommendations, a spray booth filter system or a preparation station filter system with a minimum control efficiency of 98% for PM₁₀ emissions as documented by the filter manufacturer.

[2/6/2014]

9.24 Baghouse Operating Requirements

- The permittee shall install and operate a baghouse to control PM₁₀ and PM emissions from the Maintenance Shop's wood working equipment stack.
- Within 60 days of permit issuance, the permittee shall have developed a baghouse procedures document for the inspection and operation of baghouse which controls the PM₁₀ and PM emissions from the Maintenance Shop's wood working equipment stack. The baghouse procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The baghouse procedures document shall describe the procedures that will be followed to comply with the General Compliance of the General Provisions of this permit and shall contain requirements for quarterly see-no-see visible emissions inspections of the baghouse stack. The inspections shall occur during daylight hours and under normal operating conditions.

The baghouse procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at anytime. At a minimum the document shall include:

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

The permittee shall maintain records of the results of each baghouse inspections in accordance with Monitoring and Recordkeeping requirements in the General Provisions of this permit. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The baghouse procedures document shall be submitted to DEQ within 60 days of permit issuance for review and comment and shall contain a certification by a responsible official. Any changes to the baghouse procedures document shall be submitted within 15 days of the change.

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

The operating and monitoring requirements specified in the baghouse procedures document are incorporated by reference to this permit and are enforceable permit conditions.

[2/6/2014]

Monitoring and Recordkeeping Requirements

9.25 Material Purchase Records and Material Safety Data Sheet

For each material used in the Maintenance Shop paint booth No. 3 coating process, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, and thinner/reducer, and undercoating coatings, the permittee shall record and maintain the following records:

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

[2/6/2014]

9.26 Coating Materials Usage Recordkeeping

When the Maintenance Shop paint booth No. 3 coating process is in operation the permittee shall collect and maintain records of the following information to demonstrate compliance with the Coating Materials Use Limit permit condition:

- On a calendar day basis, the quantity of each material used in the Maintenance Shop paint booth No. 3 coating process, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, and thinner/reducer, and undercoating coatings.

[2/6/2014]

9.27 Recordkeeping

The permittee shall comply with the recordkeeping General Provision requirements.

[2/6/2014]

10 Welding, Abrasive Blasting, Plasma Cutting, Kilns, and Solvent Cleaning Operations

10.1 Process Description

Welding EAMES Building

There are two types of stainless steel and five types of carbon steel welding materials used during classroom instruction at the EAMES Building.

Welding Facilities Maintenance

Miscellaneous repair and maintenance is performed at the campus using three manual welders.

Abrasive Blasting

Abrasive blasting is used at ISU to clean and prepare the surface of parts. There are three abrasive blast cabinets completely enclosed, with hand holes similar to a medical box, with gloves for the user to insert their hands. Each abrasive cabinet is equipped with a filter or filter bag with a filter efficiency of at least 75.0%.

Plasma Cutting

One hand plasma cutter is occasionally used to cut low carbon steel and plate up to ¼" thick.

Solvent Cleaning

Small engine parts are cleaned in solvent rinsing sinks at the Automotive Mechanics Program (AUTM) at EAMES. Small parts are also cleaned in a solvent sink at the Diesel Mechanics Program (DESL) and a solvent rinsing sink at the On-Site Power (OSP) at the EAMES building.

Pottery Kiln

ISU has one pottery kiln used for drying pottery. This kiln is used on an as-needed and irregular basis.

[7/30/2020]

10.2 Control Device Descriptions

Table 10.1 Welding, Abrasive Blasting, Plasma Cutting, Kilns, and Solvent Cleaning Operation Descriptions

Emissions Units / Processes	Control Devices
<u>Welding EAMES Building</u> Qty (18) Miller Syncrowave 250DX 907194 Qty (6) Miller Syncrowave Qty (18) Lincoln Electric Invertec V350 Pro Qty(17) Miller 70 SeriesXMT350 Qty(1) Miller XMT 304 CC/CV 70 Series	99.0% Fume Control Filter for Stainless Steel 309 Welding Only
<u>Welding Facilities Maintenance</u> Qty (1) Miller Syncrowave 180sd Qty (1) Miller Syncrowave 520 xmatic Qty (1) Lincoln Wirematic 255	
<u>Abrasive Blasting Qty (3):</u> Manufacturer: Econoline Model: 101717R-A Manufacturer: Allsource Model: 41500 Manufacturer: Econoline Model: 101698R-A	<u>Completely Enclosed Booths with Baghouses:</u> Manufacturer: Econoline Type: 100 CFM DK Control efficiency: 75.0% or greater for PM ₁₀ and PM _{2.5}
<u>Plasma Cutting</u>	None
<u>Solvent Cleaning</u> 6 Sinks	
<u>Pottery Kiln</u> Manufacturer: Cooperworks – Custom – Built Model: P-330 Date of Construction: April 2020 Rating: 2 Burners at 0.4 MMBtu/hr each	

[7/30/2020]

Emission Limits

10.3 Emission Limits

The emissions from the welding, abrasive blasting, plasma cutting, pottery kiln, and solvent cleaning stack shall not exceed any corresponding emissions rate limits listed in Table 10.2.

Table 10.2 Welding, Abrasive Blasting, Plasma Cutting, Kilns, and Solvent Cleaning Operation Emission Limits ^(a)

Source Description	PM _{2.5} ^(b)		PM ₁₀ ^(b)		SO ₂		NO _x		CO		VOC	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Welding EAMES Building	1.04E-01	0.20	1.04E-01	0.20	-	-	-	-	-	-	-	-
Welding - Facilities	9.06E-04	0.0005	9.06E-04	0.0005	-	-	-	-	-	-	-	-
Abrasive Blasting	1.8E-04	0.00005	1.8E-04	0.00005	-	-	-	-	-	-	-	-
Plasma Cutting	9.92E-04	0.0001	9.92E-04	0.0001	-	-	1.26	0.008	-	-	-	-
Pottery Kiln	0.01	0.03	0.01	0.03	0.0005	0.002	0.08	0.3	0.07	0.3	0.00	0.02
Solvent Cleaning	-	-	-	-	-	-	-	-	-	-	0.74	1.4

- a) In absence of any other credible evidence, compliance is ensured 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 test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d) Tons per any consecutive 12-calendar month period.

[9/21/2020]

10.4 Opacity Limit

Emissions from the welding, abrasive blasting, plasma cutting, pottery kiln, and solvent cleaning stack, or any other stack, vent, or functionally equivalent opening associated with the welding, abrasive blasting, plasma cutting, pottery kiln, and solvent cleaning, 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.

[7/30/2020]

Operating Requirements

10.5 Type of Welding, Welding Rod Type, and Usage

- The permittee shall use the equivalent rods and types of welding as specified in Table 10.3.
- In any consecutive 12 calendar months, the welding rods usage shall not exceed the daily and annual limits listed in Table 10.3.
- For the purposes of Table 10.3, “or equivalent” is defined as that a HAP and TAP content of new welding rod, as listed in the Safety Data Sheet (SDS) is equal to or less than the HAP and TAP content listed in its AP-42 Equivalent Electrode Type listed in Table 10.3.

Table 10.3 Welding Type, Equivalent Rod, and Throughput

Welding Wire	Daily Limit (lb/day)	Annual Limit (lb/yr)
Hobart E7018 SMAW	39	10,400
Lincoln E6010 SMAW	21	5,760
Lincoln ER70S-6 GTAW	17	2,880
Lincoln ER71-T GTAW	19	3,040
Pinnacle ER70S-2 GTAW	8	1,440
ER 309L-16 GTAW	9	80
Blue Demon 309L-16 SMAW	14	96
Lincoln 7018 SMAW	0.1	5
Harris 6013 Mild Steel SMAW	0.1	5
Pro Star Carbon Steel Welding	1.7	90
Pro Star Carbon Steel/Flux Core	0.8	40
Pro Star Aluminum	0.04	2
Rockmount Carbon Steel TIG	0.3	4.9

Welding Wire	Daily Limit (lb/day)	Annual Limit (lb/yr)
Rockmount Stainless Steel	0.4	6.5
Rockmount Neptune Aluminum	0.1	2.2

[9/21/2020]

10.6 Abrasive Blasting Media Type

Glass beads shall be used exclusively as the only abrasive blasting media.

[7/30/2020]

10.7 Daily and Annual Abrasive Blasting Media Usage Limit

The total abrasive blasting media shall not exceed 1.9 pounds per day and 300 pounds per year. Recycled abrasive blasting media shall not be used.

[7/30/2020]

10.8 Particulate Emission Control

The permittee shall keep the abrasive blasting booth completely enclosed, and capture the emissions from the abrasive operation, and vent the emissions to a baghouse that has a control efficiency of 75% or greater for PM_{2.5} and PM₁₀.

[7/30/2020]

10.9 Plasma Cutting Daily and Annual Use Limit

The Permittee shall only plasma cut one hour per day and 12 hours per year.

[7/30/2020]

10.10 Annual Solvent Cleaning Usage Limit

The total solvent cleaning sinks shall not exceed six (6) sinks.

[7/30/2020]

Monitoring and Recordkeeping Requirements

10.11 Records of Welding Type, Welding Rod Type, and Usage

- The permittee shall monitor and record monthly, for each welding rod, the welding rod type and its equivalent in AP-42, welding rod product name and model, the welding rod usage in pounds, and the type of welding.
- For each rod, each month, the permittee shall add the monthly rod usage to the previous 11-month rod usage to demonstrate compliance with the annual limits in Table 10.3.

[7/30/2020]

10.12 Welding Rod Daily and Annual Usage Monitoring Requirement

For each type of rod, each day, the permittee shall add the daily rod usage to demonstrate compliance with the daily and Annual usage permit condition.

[7/30/2020]

10.13 Blasting Media Type Monitoring Requirements

The permittee shall maintain purchasing records to demonstrate compliance with the Abrasive Blasting Media Type permit condition.

[7/30/2020]

10.14 Daily and Annual Abrasive Blasting Media Usage Monitoring Requirement

The permittee shall monitor and record daily, and monthly, in pounds, the blasting media consumed in the abrasive blasting operation to demonstrate compliance with the Daily and Annual Abrasive Blasting Media Usage permit condition.

The current month shall be added to the previous 11-months to record the annual usage.

[7/30/2020]

10.15 Particulate Emission Control Monitoring Requirement for Abrasive Blasting

The permittee shall maintain a Baghouse/Filter System Procedures document for the inspection and operation of the baghouse/filter system which controls emissions from the abrasive blasting operation. The Baghouse/Filter System procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse/Filter System Procedures document shall describe the procedures that will be followed to comply with General Provision 11.2 and shall contain requirements for weekly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

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

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

The permittee shall maintain records of the results of each baghouse/filter system inspection in accordance with General Provision 11.10. The records shall include, but not be limited to, the following:

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

The Baghouse/Filter System Procedures document shall be submitted to DEQ within 60 days of the permit issuance for review and shall contain a certification by a responsible official. Any changes to the Baghouse/Filter System Procedures document shall be submitted within 15 days of the change.

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

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

[7/30/2020]

10.16 Abrasive Blasting Baghouse Documentation Requirement

The permittee shall keep the documentation on the bags/filters control efficiency from the manufacturer that shows the bags/filters control efficiency for PM_{2.5} and PM₁₀ is 75.00% or greater.

[7/30/2020]

10.17 Plasma Cutting Daily and Annual Use Monitoring Requirement

The permittee shall record on a daily basis the time Plasma Cutting was performed.

[7/30/2020]

11 General Provisions

General Compliance

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

[Idaho Code §39-101, et seq.]

11.2 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, 5/1/1994]

11.3 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, 5/1/1994]

Inspection and Entry

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

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

[Idaho Code §39-108]

Construction and Operation Notification

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

[IDAPA 58.01.01.211.02, 5/1/1994]

11.6 The permittee shall furnish DEQ written notifications as follows:

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

[IDAPA 58.01.01.211.01, 5/1/1994]

- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/1994]

Performance Testing

11.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

11.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

11.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/2015]

Monitoring and Recordkeeping

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

[IDAPA 58.01.01.211, 5/1/1994]

Excess Emissions

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

[IDAPA 58.01.01.130–136, 4/5/2000]

Certification

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

[IDAPA 58.01.01.123, 5/1/1994]

False Statements

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

[IDAPA 58.01.01.125, 3/23/1998]

Tampering

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

[IDAPA 58.01.01.126, 3/23/1998]

Transferability

11.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/2006]

Severability

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

[IDAPA 58.01.01.211, 5/1/1994]