



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

August 31, 2010

Jack P. Ambrosiani, President
Cygnus, Inc.
PO Box 466
Ponderay, Idaho 83852

RE: Facility ID No. 017-00051, Cygnus, Inc., Ponderay
Final Permit Letter

Dear Mr. Ambrosiani:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2010.0068 to Cygnus, Inc. for the addition of paint booth #3 at Ponderay, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho). This permit is based on your permit application received on May 17, 2010. This permit is effective immediately and replaces PTC No. P-040126, issued on January 6, 2006. This permit does not release Cygnus, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Coeur d'Alene Regional Office, 2110 Ironwood Parkway, Coeur d'Alene, Idaho 83814, Fax (208) 769-1404.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Almer Casile, Air Quality Analyst, at (208) 769-1422 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 Eric Clark at (208) 373-0502 or eric.clark@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". The signature is written in a cursive, flowing style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\EC

Permit No. P-2010.0068 PROJ 0001

| | | | |
|--|----------------------------------|-----------------------------|-----------------|
| <p style="text-align: center;">Air Quality PERMIT TO CONSTRUCT State of Idaho Department of Environmental Quality</p> | PERMIT NUMBER | CLASS | SIC |
| | P-2010.0068 | B | 3471 |
| | FACILITY ID | AQCR | NAICS |
| | 017-00051 | 63 | 332813 |
| | ZONE | UTM COORDINATES (km) | |
| 11 | 534.5 | 5349.6 | |
| PERMITTEE | | | |
| Cygnus, Inc. | | | |
| PROJECT | | | |
| Permit to Construct Modification | | | |
| MAILING ADDRESS | CITY | STATE | ZIP |
| P.O. Box 466 | Ponderay | ID | 83852 |
| FACILITY CONTACT | TITLE | TELEPHONE | |
| Abraham Dale | Environmental Compliance Manager | (208) 263 - 4761 | |
| RESPONSIBLE | TITLE | TELEPHONE | |
| Jack P. Ambrosiani | President | (208) 263 - 4761 | |
| EXACT PLANT LOCATION | | COUNTY | |
| 122 Emerald Industrial Park Road, Ponderay, Idaho | | Bonner | |
| GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS | | | |
| Metal Finishing – manufacturing, conversion coating, anodizing and application of aerospace paints of aluminum sheet metal | | | |
| PERMIT AUTHORITY | | | |
| <p>This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.</p> <p>This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.</p> <p>This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.</p> <p>This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.</p> | | | |
|  | | DATE ISSUED | August 31, 2010 |
| ERIC CLARK, PERMIT WRITER | | | |
|  | | | |
| MIKE SIMON, STATIONARY SOURCE MANAGER | | | |

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PERMIT TO CONSTRUCT SCOPE

Purpose

1. This is a modification of a permit to construct to include a third bench paint booth.
2. Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
3. This PTC replaces Permit to Construct No. P-040126, issued on January 6, 2006.
4. The emission sources regulated by this permit are listed in the following table.

Table 1 REGULATED SOURCES

| Source Descriptions | Emission Controls |
|---|--------------------------------|
| <u>Paint Spray Booth #1</u> Manufacturer: Binks, Accuspray Model: ISL HVLP, 19 Series Type: All are HVLP Capacity Rating: 1.22 gal/hr Transfer Efficiency: Minimum of 65% | Filtration System HVLP Guns |
| <u>Paint Spray Booth #2</u> Manufacturer: Binks, Accuspray Model: ISL HVLP, 19 Series Type: All are HVLP Capacity Rating: 1.22 gal/hr Transfer Efficiency: Minimum of 65% | Filtration System HVLP Guns |
| <u>Paint Sprav Booth #3</u> Manufacturer: Paasche Model: FABF-6 Type: All are HVLP Capacity Rating: 1.22 gal/hr Transfer Efficiency: Minimum of 65% | Filtration System HVLP Guns |
| <u>Space Heating and Furnaces</u> Manufacturer: Ruud (3) Model: Silhouette II Heat Input: 150,000 Btu/hr | None |
| <u>Space Heating and Furnaces</u> Manufacturer: Lennox Model: LF3E Heat Input: 200,000 Btu/hr | None |
| <u>Space Heating and Furnaces</u> Manufacturer: Carrier (2) Model: 58 RAV Heat Input:: 140,000 Btu/hr | None |
| <u>Space Heating and Furnaces</u> Manufacturer: Power Flame, Inc. (2) Model: CX-30 Heat Input: 600,000 Btu/hr | None |
| <u>Make-up Air Unit</u> Manufacturer: ARES Model: 1200 Heat Input: 1.2 MMBtu/hr | None |

[August 31, 2010]

METAL PARTS AND PRODUCTS COATING OPERATIONS

Process Description

5. Process Description

The facility operates three bench-style paint booths, PB-1, PB-2 and PB-3, for the application of various aerospace paints.

[August 31, 2010]

6. Emission Controls Description

Particulate matter emissions from painting operations are controlled by a filter stack consisting of three filters arranged back-to-back. Each paint booth is equipped with its own filter stack. Each filter stack has a capture efficiency of 99.99% for PM₁₀ sized particulate.

Table 2 PAINT BOOTHS DESCRIPTION

| Emissions Units / Processes | Emission Control Devices | Emission Points |
|-----------------------------|--------------------------|-----------------|
| Paint Booth PB-1 | Filtration System | PB-1 Stack |
| Paint Booth PB-2 | Filtration System | PB-2 Stack |
| Paint Booth PB-3 | Filtration System | PB-3 Stack |

[August 31, 2010]

Emission Limits

7. Emissions Limits

The emissions from the Paint Booth No. 1, No.2 and No. 3 stacks shall not exceed any emissions rate limit in the following table.

Table 3 PAINT BOOTH 1 - 3 EMISSION LIMITS^a

| Emissions Unit | VOC | |
|------------------|--------------------|-------------------|
| | lb/hr ^b | T/yr ^c |
| Paint Booths 1-3 | 2.65 | 11.63 |

a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.

b) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.

c) Tons per any consecutive 12-calendar month period.

[August 31, 2010]

8. Opacity Limit

Emissions from each paint booth stack (PB-1 stack, PB-2 stack, PB-3 stack), or any other stack, vent, or functionally equivalent opening associated with the paint booths, 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.

9. Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776.

[August 31, 2010]

Operating Requirements

10. Paint Booth Filter System

The permittee shall monitor and record visible emissions from the spray booth filter system **once per day** when operating (for any day that a coating operation is performed in the paint spray booths) to demonstrate compliance with the opacity limit Permit Condition. The inspection shall consist of a see/no see evaluation for the paint spray booth exhaust system. If any visible emissions are present from the paint spray booth exhaust system, the permittee shall either take appropriate corrective action as expeditiously as practicable, or 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% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136.

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 opacity 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.

[August 31, 2010]

11. Filter Stack Operations

The permittee shall install, maintain and operate, according to manufacturers and O&M manual recommendations and specifications, a filter stack, with 99.99% filters for booths PB-1, PB-2 and PB-3.

[August 31, 2010]

12. Prohibition From Using MeCl to Remove Paint

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

[August 31, 2010]

13. Operations and Maintenance Manual Requirements

If any changes or updates are made to the O&M manual which describes the procedures that will be followed to comply with the control equipment General Provision and the air pollution control device requirements contained in this permit, the permittee shall notify DEQ. The manual shall remain onsite at all times and made available to DEQ representatives upon request.

[August 31, 2010]

14. HAP Emissions Limits

Emissions of HAPs from the metal parts and products coating process, including but not limited to HAPs emissions from thinner, reducer, primer, top coat, and clear coat, shall not exceed 10 T/yr for any one HAP. 12.48 T/yr for all HAPs combined shall also not be exceeded.

[August 31, 2010]

15. TAP Emissions Limit

Emissions of TAPs from the metal parts and products coating process, including but not limited to TAPs emissions from thinner, reducer, primer, top coat, and clear coat, shall not exceed either the EL (lb/hr) (for TAPs listed in both IDAPA 58.01.01.585 and 586) or the AAC (mg/m³) (for TAPs listed in IDAPA 58.01.01.585) or the AACC (µg/m³) (for TAPs listed in IDAPA 58.01.01.586).

[August 31, 2010]

16. Material Safety Data Sheets

For paint booths PB-1, PB-2 and PB-3, the permittee shall maintain the MSDS' for the coatings that contain HAPs purchased pursuant to the Purchase Records permit condition. The MSDS' shall remain on site at all times and shall be made available to DEQ representatives upon request.

[August 31, 2010]

17. 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).
- 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.
- 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 4, in accordance with 40 CFR 63.11174(a).

Table 4 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 | |

| Citation | Subject | Explanation |
|-------------------------|--|--|
| | 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 | |

[August 31, 2010]

Monitoring and Recordkeeping Requirements

18. Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with the odors Permit Condition. The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date 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.

[August 31, 2010]

19. Material Purchase Records

For paint booths PB-1, PB-2 and PB-3, the permittee shall maintain the purchase records of all coatings. The purchase records shall remain on site for the most recent five year period and shall be made available to DEQ representatives upon request.

[August 31, 2010]

20. Coatings Usage Records

The permittee shall monitor and record daily, in gallons, the usage of all materials used in the metal parts and products coating process including but not limited to thinner, reducer, primer, top coat and clear coat.

[August 31, 2010]

21. HAPs Monitoring Requirements

Using the purchase records, MSDSs, and material usage records, the permittee shall monitor and record the monthly and annual HAPs (as defined in IDAPA 58.01.01.006) emissions in tons from the metals parts and products coating process in order to demonstrate compliance with the HAPs emissions limits Permit Condition.

Monthly HAP emissions shall be determined by summing total HAP emissions of each material used. HAP emission of each material used shall be calculated as follows:

Total monthly HAPs emissions = [Percent HAP #1 content (material #1) ÷ 100 x Density in pounds per gallon (material #1) x monthly usage in gallons (material #1)] ÷ 2,000 pounds per ton + [Percent HAP #2 content (material #1) ÷ 100 x Density in pounds per gallon (material #1) x monthly usage in gallons (material #1)] ÷ 2,000 pounds per ton + ... + Percent HAP #n content (material #1) ÷ 100 x Density in pounds per gallon (material #1) x monthly usage in gallons (material #1)] ÷ 2,000 pounds per ton + ... + [Percent HAP #1 content (material #n) ÷ 100 x Density in pounds per gallon (material #1) x monthly usage in gallons (material #1)] ÷ 2,000 pounds per ton + [Percent HAP #2 content (material #n) ÷ 100 x Density in pounds per gallon (material #1) x monthly usage in gallons (material #1)] ÷ 2,000 pounds per ton + ... + Percent HAP #n content (material #n) ÷ 100 x Density in pounds per gallon (material #n) x monthly usage in gallons (material #n)] ÷ 2,000 pounds per ton

Annual HAPs emissions shall be determined by summing total monthly HAPs emissions over each previous consecutive 12-month period.

[August 31, 2010]

22. TAPs Emissions Monitoring Requirements

Using the purchase records, MSDSs, and material usage records, the permittee shall monitor and record the individual hourly TAPs (as specified in IDAPA 58.01.01.585 and 586) emissions from the metal parts and products coating process in order to demonstrate compliance with the TAPs emissions limits permit condition.

Each individual hourly TAPs emissions (except for chromium, lead, manganese, nickel, or cadmium because they are regulated by HHHHHH) shall be calculated for each material as follows:

Hourly TAPs emissions = [Percent TAP #1 content (material #1) ÷ 100 x Density in pounds per gallon (material #1) x daily usage in gallons (material #1) ÷ 24 hours/day]

If any of the individual hourly TAPs emissions limits exceed the screening emissions level (EL) specified in IDAPA 58.01.01.585 and 586, a modeling demonstration, per IDAPA 58.01.01.210, shall be conducted to demonstrate compliance with the AAC (mg/m³) (for TAPs listed in IDAPA 58.01.01.585) or the AACC (µg/m³) (for TAPs listed in IDAPA 58.01.01.586).

[August 31, 2010]

23. VOC Emissions Monitoring Requirements

Using the purchase records, MSDSs, and material usage records, the permittee shall monitor and record the monthly and annual VOC emissions in tons from the metal parts and products coating process in order to demonstrate compliance with the emissions limits Permit Condition.

Monthly VOC emissions shall be determined by summing total VOC emissions of each material used. VOC emission of each material used shall be calculated as follows:

Total monthly VOC emissions = [Percent VOC content (material #1) ÷ 100 x Density in pounds per gallon (material #1) x monthly usage in gallons (material #1)] ÷ 2,000 pounds per ton + ... + [Percent VOC content (material #n) ÷ 100 x Density in pounds per gallon (material #n) x monthly usage in gallons (material #n)] ÷ 2,000 pounds per ton

Annual VOC emissions shall be determined by summing total monthly VOC emissions over each previous consecutive 12-month period.

[August 31, 2010]

24. 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Recordkeeping 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 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.

[August 31, 2010]

25. 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.

[August 31, 2010]

26. Recordkeeping

The permittee shall comply with the recordkeeping requirements General Provision.

[August 31, 2010]

Reporting Requirements

27. 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, you 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, email 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.

[August 31, 2010]

28. 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

- 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
Director, Office of Air Quality
1200 Sixth Avenue
(OAQ-107)
Seattle, WA 98101

And,

Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2210 Ironwood Parkway.
Coeur d'Alene, ID 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

[August 31, 2010]

FUEL-BURNING EQUIPMENT

Process Description

29. Process Description

The facility operates the natural gas-fired equipment to generate process heat and space heating.

30. Emissions Control Description

The natural gas-fired equipment is uncontrolled.

Table 5 FUEL-BURNING EQUIPMENT DESCRIPTION

| Emissions Unit(s) / Process(es) | Emissions Control Device | Emissions Point |
|---------------------------------|--------------------------|--------------------------|
| Ruud Silhouette II | None | Ruud Silhouette II Stack |
| Ruud Silhouette II | None | Ruud Silhouette II Stack |
| Ruud Silhouette II | None | Ruud Silhouette II Stack |
| Lennox LF 3E | None | Lennox LF 3E Stack |
| Carrier 58 RAV | None | Carrier 58 RAV Stack |
| Carrier 58 RAV | None | Carrier 58 RAV Stack |
| Power Flame CX-30 | None | Power Flame CX-30 Stack |
| Make-up Air Unit | None | Make-up Air Unit Stack |

Emission Limits

31. Opacity Limit

Emissions from combustion equipment listed in the above table, or any other stack, vent, or functionally equivalent opening associated with this facility, 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.

32. Grain-loading Limit

Particulate matter emissions from combustion source listed in the fuel-burning equipment table above shall not exceed a concentration of 0.015 grains per dry standard cubic feet (gr/dscf) corrected to 3% oxygen in accordance with IDAPA 58.01.01.676.

Operating Requirements

33. Heat Input Capacity

Natural gas use by the combustion equipment listed in the fuel-burning equipment table above shall not exceed 195,804 therms per year.

34. Fuel Type

All combustion sources listed in the fuel-burning equipment table above shall burn natural gas only.

Monitoring and Recordkeeping Requirements

35. Heat Input Capacity Monitoring

The permittee shall monitor and record monthly the total therms used by all combustion sources listed in the equipment table. Total annual natural gas fuel use of the combustion sources listed in Table 5 shall be determined by summing total amount of therms used each month over the previous consecutive 12-month period.

36. Recordkeeping

The permittee shall comply with the recordkeeping requirements General Provision.

[August 31, 2010]

PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

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

[Idaho Code §39-101, et seq.]

38. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

39. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

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

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

[Idaho Code §39-108]

Construction and Operation Notification

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

- A notification of the date of initiation of construction, within five working days after occurrence;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

Performance Testing

42. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ, at its option, may have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
43. 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.
44. Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

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

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

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

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

Certification

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

[IDAPA 58.01.01.123, 5/1/94]

False Statements

48. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125, 3/23/98]

Tampering

49. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.126, 3/23/98]

Transferability

50. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.
[IDAPA 58.01.01.209.06, 4/11/06]

Severability

51. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
[IDAPA 58.01.01.211, 5/1/94]