



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
John H. Tippetts, Director

March 29, 2017

Don Suggs, CEO
Rhino Metals, Inc.
607 Garber Street
Caldwell, ID 83605

RE: Facility ID No. 027-00169, Rhino Metals, Inc., Caldwell
Final Permit Letter

Dear Mr. Suggs:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P- 2016.0072 Project 61830 to Rhino Metals, Inc. located at 607 Garber Street in Caldwell for a metal safe manufacturing facility. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received December 13, 2016.

This permit is effective immediately. This permit does not release Rhino Metals, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard Street, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, AQ Compliance Officer, at (208) 373-0419 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Morrie Lewis at (208) 373-0502 or Morrie.Lewis@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".

for, Mike Simon
Stationary Source Program Manager
Air Quality Division
MS\ML
Permit No. P- 2016.0072 PROJ 61830
Enclosures

Air Quality

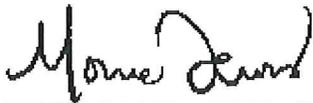
PERMIT TO CONSTRUCT

Permittee	Rhino Metals, Inc.
Permit Number	P-2016.0072
Project ID	61830
Facility ID	027-00169
Facility Location	607 Garber St. Caldwell, Idaho 83605

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 March 29, 2017



Morrie Lewis, Permit Writer



Mike Simon, Stationary Source Manager



Contents

1	Permit Scope.....	3
2	Metal Fabrication and Interior Finishing.....	5
3	Coating and Curing.....	7
4	General Provisions.....	15

1 Permit Scope

Purpose

1.1 This is the initial permit to construct (PTC) a metal safe manufacturing facility.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	CNC Plasma Cutting Machine	<u>Reasonable control of fugitive emissions</u> Cutting operations are conducted within an enclosed building; emissions may also be captured and vented to a fume collector and filtration system.
2	CNC Fiber Laser Cutting Machine	<u>Reasonable control of fugitive emissions</u> Cutting operations are conducted within an enclosed building; emissions may also be captured and vented to a fume collector and filtration system.
3	<u>Spray Booth # 1</u> Manufacturer: Thermotek or equivalent ^(a) Model: RAM2.36-A20-18A or equivalent ^(a) Maximum capacity: 1,417,500 Btu/hr Fuel: natural gas Date of installation: 3/22/2016 Maximum operation: 15,816,176 scf/yr (facility-wide) Maximum operation: 119.1 gal/day, 44,484 gal/yr, or as limited by Coating Emission Limits (facility-wide)	<u>Reasonable control of fugitive emissions</u> Spray coatings are applied within an enclosed building, or emissions may be captured and vented to a filtration system; all spray guns have a minimum of 65% transfer efficiency (see below). <u>Spray Booth # 1 filter system</u> Particulate filtration method: dry filters Manufacturer: Air Flow Technologies Series ^(a) Model: 15g or equivalent ^(a) PM Control Efficiency: 98.81% or greater
3	<u>Spray Booth # 2</u> Manufacturer: Thermotek or equivalent ^(a) Model: RAM2.36-A20-18A or equivalent ^(a) Maximum capacity: 1,417,500 Btu/hr Fuel: natural gas Date of installation: 3/22/2016 Maximum operation: 15,816,176 scf/yr (facility-wide) Maximum operation: 119.1 gal/day, 44,484 gal/yr, or as limited by Coating Emission Limits (facility-wide)	<u>Reasonable control of fugitive emissions</u> Spray coatings are applied within an enclosed building, or emissions may be captured and vented to a filtration system; all spray guns have a minimum of 65% transfer efficiency (see below). <u>Spray Booth # 2 filter system</u> Particulate filtration method: dry filters Manufacturer: Air Flow Technologies Series ^(a) Model: 15g or equivalent ^(a) PM Control Efficiency: 98.81% or greater
3	<u>Spray guns</u> Manufacturer: SATAjet or equivalent ^(a) Model: 5000 B RP or equivalent ^(a)	<u>Reasonable control of fugitive emissions</u> Spray coatings are applied within an enclosed building, or emissions may be captured and vented to a filtration system; all spray guns have a minimum of 65% transfer efficiency (see below). <u>Spray guns</u> Type: reduced pressure (RP) or equivalent ^(a) Transfer Efficiency: 65% or greater

Table 1.1 (continued)

3	<u>Curing Oven</u> Manufacturer: Power Flame or equivalent ^(a) Model: FD75-PB Maximum capacity: 750,000 Btu/hr Fuel: natural gas Date of installation: (unknown) Maximum operation: 15,816,176 scf/yr (facility-wide)	None
2	<u>GMAW Welding Machines</u> Manufacturers: Miller or equivalent ^(a) Models: Millermatic 252 or equivalent ^(a) Electrode type: E70S ^(a) Maximum operation: 30,660 lb electrode/yr	<u>Reasonable control of fugitive emissions</u> Welding operations are conducted within an enclosed building; emissions may also be captured and vented to a fume collector and filtration system.

(a) "or equivalent" equipment is equipment which has equivalent or less maximum capacity and equivalent or lower pollutant emission rates, whether calculated based on maximum design capacity or based on established permit limits. Use of replacement equipment shall not result in the emission of any regulated air pollutant not previously emitted, and shall not result in an emission increase as defined in IDAPA 58.01.01.007.

2 Metal Fabrication and Interior Finishing

2.1 Process Description

Rhino Metals, Inc. fabricates metal furniture, including metal safes.

Steel is cut and welded into product components. Steel is cut using a Computer Numeric Control (CNC) Plasma Cutting Machine and a CNC Fiber Laser Cutting Machine, each equipped with downdraft systems with internal baghouses; these units exhaust inside the building. Gas Metal Arc welding (GMAW) is conducted using welding machines.

Welded steel components are taken to the product finishing area and prepared for coating and curing (Section 3). After completion of exterior painting, interiors of the metal security safes are fitted with gypsum board for fire protection and fabric-upholstered wood particleboard for shelving. Gypsum board cutting, particleboard cutting, and fabric upholstery is all completed indoors. Particleboard is cut using CNC router cutting machines equipped with downdraft systems with an internal baghouse; the units exhaust inside the building. The fabric upholstery is adhered to particleboard using a water-based glue.

No atmospheric emissions sources are associated with these processes.

2.2 Control Device Descriptions

Table 2.1 Metal Fabrication and Interior Finishing Description

Source	Control Equipment
CNC Plasma Cutting Machine	<u>Reasonable control of fugitive emissions</u> Cutting operations are conducted within an enclosed building; emissions may also be captured and vented to a fume collector and filtration system.
CNC Fiber Laser Cutting Machine	<u>Reasonable control of fugitive emissions</u> Cutting operations are conducted within an enclosed building; emissions may also be captured and vented to a fume collector and filtration system.
Welding Machines	<u>Reasonable control of fugitive emissions</u> Welding operations are conducted within an enclosed building; emissions may also be captured and vented to a fume collector and filtration system.

Emission Limits

2.3 Opacity Limit

Emissions from any building stack, vent, or functionally equivalent opening associated with the CNC Plasma Cutting Machine, the CNC Fiber Laser Cutting Machine, or welding machines 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.

2.4 Reasonable Control of Fugitive Emissions

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:

- 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, 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, when 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.
- Prompt removal of earth or other stored material from streets, where practical.

Operating Requirements

2.5 Welding Material Usage Limits

Only gas metal arc welding (GMAW) using E70S electrode shall be conducted at the facility, and the maximum amount of all GMAW materials used shall not exceed 30,660 pounds per calendar year (lb/yr).

Monitoring and Recordkeeping Requirements

2.6 Welding Usage Monitoring

Each calendar month, the permittee shall monitor and record the amount of welding materials used in welding operations for the previous month in pounds per month (lb/mo) and for the previous 12 calendar months (lb/yr) to demonstrate compliance with Welding Material Usage Limits.

Records shall be maintained in accordance with the monitoring and recordkeeping requirements included in the General Provisions of this permit.

3 Coating and Curing

3.1 Process Description

Welded steel components are prepped and coated. Surface preparation involves the application of bonding fillers, light sanding and surface cleaning in two wash bays that utilize a VOC-free solution to remove debris from the safes.

Product is placed into spray booths for primer application, coating application, and drying. The spray booths are each heated with natural gas-fired heaters, and equipped with particulate filtration systems.

Some products are painted using a powder coating process that utilizes VOC-free content coatings and a curing oven on an as-needed basis.

3.2 Control Device Descriptions

Table 3.1 Coating Description

Source	Control Equipment
Spray Booth # 1, Spray Booth # 2, and spray guns	Reasonable control of fugitive emissions Spray coatings are applied within an enclosed building, or emissions may be captured and vented to a filtration system; all spray guns have a minimum of 65% transfer efficiency (see below).

Emission Limits

3.3 Coating Emission Limits

The emissions from each spray booth stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Coating Emission Limits ^(a)

Source Description	PM _{2.5} ^(b)	VOC ^(c)	Individual HAP ^{(d)(e)}	Total HAP ^{(d)(f)}	Individual TAP ^(g)
	T/yr ^(h)	T/yr ^(h)	T/yr ^(h)	T/yr ^(h)	lb/hr ⁽ⁱ⁾
All coating operations (including from Spray Booth # 1 stack, Spray Booth # 2 stack, and fugitive emissions, combined)	0.66	81.30	9.49	15.00	EL ^(g)

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM_{2.5}), including condensable particulate as defined in IDAPA 58.01.01.006.
- c) Volatile organic compounds (VOC).
- d) Hazardous air pollutants (HAP).
- e) Emission limit for each individual HAP.
- f) Emission limit for total of all HAP (combined).
- g) Toxic air pollutants (TAP); emission limits are screening emission levels (EL) in IDAPA 58.01.01.585–586 (Sections 585–586) for each TAP emitted. Compliance with EL shall be determined using average emission rates for the relevant monitoring period as specified in the Coating Material Formulations and Equipment Replacement Monitoring condition.
- h) Tons of emissions from all coating operations (combined) per any consecutive 12 calendar month period.
- i) Pounds per hour of emissions from all coating operations (combined), as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, emission calculations specified in the Coating Material Formulations and Equipment Replacement Monitoring condition, or DEQ-approved alternative.

3.4 Odor Limits

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.

3.5 Opacity Limit

Emissions from any building spray booth stack, curing oven stack, or any other stack, vent, or functionally equivalent opening associated with a spray booth or curing oven shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

3.6 Coating Usage Limits

The maximum amount of all coating materials used at the facility shall not exceed the usage rates listed in Table 3.3.

Table 3.3 Coating Material Usage Limits

Coating Material Group	Usage Limit	
	gal/day ^(a)	gal/yr ^(b)
Total of all coating materials (combined)	119.1	44,484
Surface preparation	3.75	
Primer	45.0	
Basecoat	37.5	
Liquid additive	2.81	
Pigment additive (tint)	2.81	
Clearcoat	30.0	

a) Gallons per calendar day

b) Gallons per rolling 12-calendar month period.

c) The total of all coating materials used, including coatings, solvents, thinners, additives, and cleaning materials.

3.7 Fuel Usage

The spray booth heaters and Curing Oven shall combust only natural gas fuel, and the rolling 12-calendar-month natural gas used by the facility shall not exceed 15,816,176 standard cubic feet per year (scf/yr).

3.8 Coating Material Formulations

The permittee shall use only the HAP-, TAP-, and VOC-containing coating materials listed in Table 3.4 as raw materials. Any changes in coating material formulations at the facility may require a permit to construct (or permit revision) in accordance with IDAPA 58.01.01.201 unless the usage of alternate coating material formulations can be demonstrated to result in emissions lower than the Coating Emission Limits (Table 3.2), and result in emissions lower than all emission screening levels for toxic air pollutants (TAP) listed in IDAPA 58.01.01.585-586.

Table 3.4 Coating Materials

Coating Material Group	Coating Material Name
Surface preparation	Low VOC Water-based Cleaner
Primer	CPS DTM Primer Base Neutral
	Direct to Metal 2K Primer - White
	DTM Surfacer / Sealer Gray
	DTM Surfacer / Sealer Black
	DTM Surfacer / Sealer Easy Sanding Gray
Basecoat	LVBR100
	ZT-20-72
	CP-3820
Liquid additive	Effect Additive
	X (Q59.Q01)
	Black Solar System Tint Base
	Jet Black
	Red Shade Blue II
	Carbizole Violet Solar System
	Sapphire Blue
	X (R52.Q01)
	Magenta Solar System Tint Base
	Quindo Violet Solar System Tint
	Fast Maroon Solar System Tint
	Scarlet Intermix Tint
	Medium Aluminum
	Bright Coarse Aluminum
	Fine Bright Aluminum
	White Solar System Tint Base
	Micro White Solar System Tint
	Red Shade Yellow
Red Shade Gold Solar System Ti	
Pigment additive (tint)	Blue
	Russett
	Gold
	P11 Copper
	P17 Fine Blue
	Galaxy Blue
Clearcoat	2.1 VOC Euro Clearcoat

3.9 Reasonable Control of Fugitive Emissions

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:

3.10 Spray Gun Operation

All painting shall be conducted with high-volume low-pressure (HVLP) spray guns, SATAjet reduced pressure (RP) spray guns, or equivalent technology with a minimum 65% transfer efficiency as documented by the spray gun manufacturer.

Monitoring and Recordkeeping Requirements

3.11 Odor Complaints

The permittee shall maintain records of all odor complaints received to demonstrate compliance with Odor Limits. 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.

3.12 Coating Usage Monitoring

Each calendar day that coatings are used, the permittee shall monitor and record the amount of each coating material used at the facility in gallons per day (gal/day) to demonstrate compliance with daily Coating Usage Limits.

Each calendar month, the permittee shall monitor and record the amount of each coating material used at the facility for the previous month in gallons per month (gal/mo) and for the previous 12 calendar months (gal/yr) to demonstrate compliance with annual Coating Usage Limits.

3.13 Fuel Usage Monitoring

Each calendar month, the permittee shall monitor and record the amount of natural gas used by the facility for the previous month (scf/mo) and for the previous 12 calendar months (scf/yr) to demonstrate compliance with the Fuel Usage limit.

3.14 Coating Material Formulations and Equipment Replacement Monitoring

In lieu of complying with Coating Usage Limits, Coating Material Formulations, and Coating Usage Monitoring permit conditions, records shall be maintained onsite demonstrating that facility-wide emissions will not exceed Coating Emission Limits and will not exceed all emission screening levels (EL) in IDAPA 58.01.01.585-586, and the permittee shall comply with the following requirements. Emissions shall be evaluated on a pollutant-by-pollutant basis. (This compliance option may be used when alternate or reformulated coating materials are in use at the facility.)

- Each calendar day that coatings are used, the permittee shall monitor and record the amount of each coating material used in gallons per calendar day (gal/day).
- Each calendar month, the permittee shall monitor and record the amount of each coating material used for the previous month in gallons per month (gal/mo) and for the previous 12 calendar months (gal/yr).

- Each calendar day that coatings are used, the permittee shall monitor and record emissions from all coating operations (facility-wide) of each individual TAP emitted in IDAPA 58.01.01.585 (Section 585) in pounds per day for the previous day (lb/day) and in pounds per hour over the 24-hour averaging period (lb/hr). Each average emission rate (lb/hr) shall be compared to the relevant EL to determine compliance with Section 585 TAP Coating Emission Limits.
- Each calendar month, the permittee shall monitor and record emissions from all coating operations (facility-wide) of each individual TAP emitted in IDAPA 58.01.01.586 (Section 586) in pounds per month for the previous month (lb/mo), in pounds per year for the previous rolling 12-calendar-month averaging period (lb/yr), and in pounds per hour over the 12-calendar-month averaging period (lb/hr). Each average emission rate (lb/hr) shall be compared to the relevant EL to determine compliance with Section 586 TAP Coating Emission Limits.
- Each calendar month, the permittee shall monitor and record the facility-wide emissions of each individual HAP, the total of all HAP, VOC, and PM_{2.5} emitted in tons per month for the previous month (T/mo), and in tons per year for the previous 12 calendar months (T/yr) to demonstrate compliance with HAP, VOC, and PM_{2.5} Coating Emission Limits.
- The permittee shall maintain documentation such as manufacturer's specification sheets that support filter efficiencies, transfer efficiencies, capture efficiencies, and other engineering assumptions relied upon in emission calculations.

3.15 Coating Material Purchase Records and Safety Data Sheets

For each material used at the facility, including but not limited to each cleaner, wash primer, primer, basecoat, liquid additive, pigment additive, clearcoat, and thinner/reducer coating material, the permittee shall record and maintain the following records:

- Material purchase records
- Safety Data Sheets (SDS)

40 CFR 60, Subpart EE Requirements

3.16 40 CFR 60, Subpart EE—Standards of Performance for Surface Coating of Metal Furniture – Standard for VOC

In accordance with 40 CFR 60.312(a), the permittee shall not cause the discharge into the atmosphere of VOC emissions from any spray booth in excess of 0.90 kilogram of VOC per liter of coating solids applied.

- Spray Booth # 1 and Spray Booth # 2 are each metal furniture surface coating operations, affected facilities as defined in 40 CFR 60.312(a).

3.17 40 CFR 60, Subpart EE—Standards of Performance for Surface Coating of Metal Furniture – Compliance

In accordance with 40 CFR 60.313, each calendar month the permittee shall determine monthly volume-weighted average emissions of VOC in kilograms per liter of coating solids applied (G) for each spray booth.

- The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The permittee shall determine the volume of coating and the mass of VOC-solvent used for thinning purposes from company records on a monthly basis. If a common coating distribution system serves more than one spray booth, the permittee shall estimate the volume of coating used at each spray booth by using the average dry weight of coating and the surface area coated by each spray booth, or by other procedures approved by DEQ.
 - Calculate the volume-weighted average of the total mass of VOC consumed per unit volume of coating solids applied (G) during each calendar month for each spray booth. Except as provided below for compliant coatings (Permit Condition 3.18), the volume-weighted average of the total mass of VOC consumed per unit volume of coating solids applied (G) each calendar month will be determined by the following procedures.
 - Calculate the mass of VOC used ($M_o + M_d$) during each calendar month for each spray booth by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj}$$

($\sum L_{dj} D_{dj}$ will be 0 if no VOC solvent is added to the coatings, as received.)

Where: n is the number of different coatings used during the calendar month, and m is the number of different diluent VOC-solvents used during the calendar month.

- Calculate the total volume of coating solids used (L_s) in each calendar month for each spray booth by the following equation:

$$L_s = \sum_{i=1}^n L_{ci} V_{si}$$

Where: n is the number of different coatings used during the calendar month.

- Calculate the volume-weighted average mass of VOC consumed per unit volume of coating solids applied (G) during the calendar month for each metal furniture surface coating operation by the following equation:

$$G = \frac{M_o + M_d}{L_s T}$$

- Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the calendar month for each spray booth by the following equation:

$$N = G$$

- Where the volume-weighted average mass of VOC discharged to the atmosphere per unit volume of coating solids applied (N) is less than or equal to 0.90 kilogram per liter, the spray booth is in compliance.

3.18 40 CFR 60, Subpart EE—Standards of Performance for Surface Coating of Metal Furniture – Compliant Coatings

In accordance with 40 CFR 60.313(c)(1)(iv), if each individual coating used by a spray booth has a VOC content as received, which when divided by the lowest transfer efficiency at which the coating is applied results in a value equal to or less than 0.90 kilogram per liter, the spray booth is in compliance, provided no VOC are added to the coatings during distribution or application.

3.19 40 CFR 60, Subpart EE—Standards of Performance for Surface Coating of Metal Furniture – Recordkeeping and Reporting

In accordance with 40 CFR 60.315(a) and 40 CFR 60.8(a), within 60 days after achieving the maximum production rate of each spray booth, but not later than 180 days after initial startup of each spray booth, the permittee shall report the following data to DEQ:

- Except as provided below, the volume-weighted average mass of VOC emitted from each spray booth to the atmosphere per volume of applied coating solids (N) for a period of one calendar month.
- For each spray booth where compliance is determined under the provisions of 40 CFR 60.313(c)(1)(iv) (Permit Condition 3.18), a list of the coatings used during a period of one calendar month, the VOC content of each coating calculated from data supplied by the manufacturer of the coating, and the minimum transfer efficiency of any coating application equipment used during the month. (VOC content data may alternatively be determined using data from Method 24 testing in accordance with 40 CFR 60.316.)

3.20 40 CFR 60, Subpart EE—Standards of Performance for Surface Coating of Metal Furniture – Recurring Recordkeeping and Reporting

- In accordance with 40 CFR 60.315(b), the permittee shall identify, record, and submit a written report to DEQ every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under 40 CFR 60.312 (Standard for VOC). If no such instances have occurred during a particular quarter, a report stating this shall be submitted to DEQ semiannually.
- The permittee shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine VOC emissions from each spray booth.

3.21 40 CFR 60, Subpart A—General Provisions

The permittee shall comply with the requirements of 40 CFR 60, Subpart A – General Provisions. A summary of applicable requirements for affected facilities is provided in Table 3.5.

Table 3.5 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"> DEQ is delegated this subpart and all requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart EE shall be submitted to: Boise Regional Office Department of Environmental Quality 1445 N. Orchard St. Boise, ID 83706 Phone: (208) 373-0550 Fax: (208) 373-0287
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 emissions postmarked 60 days before the change is made. 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.
60.12	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.

3.22 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:

- Standards of Performance for New Stationary Sources (NSPS), 40 CFR 60, Subpart EE.

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS), 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.

4 General Provisions

General Compliance

4.1 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.]

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

[IDAPA 58.01.01.211, 5/1/94]

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

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4.4 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

4.5 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, 5/1/94]

4.6 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;
- 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; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 4.7 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.
- 4.8 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.
- 4.9 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 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 and 4/11/15]

Monitoring and Recordkeeping

- 4.10 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, 5/1/94]

Excess Emissions

- 4.11 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, 4/5/00]

Certification

- 4.12 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, 5/1/94]

False Statements

- 4.13 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, 3/23/98]

Tampering

- 4.14 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, 3/23/98]

Transferability

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

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

- 4.16 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, 5/1/94]