



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1445 North Orchard • Boise, Idaho 83706 • (208) 373-0550
www.deq.idaho.gov

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

June 14, 2017

Tiffany Goodvin, Safety and Health Specialist
Quest Aircraft Company, LLC
1200 Turbine Drive
Sandpoint, ID 83864

RE: Facility ID No. 017-00067, Quest Aircraft Company, LLC, Sandpoint
Final Permit Letter

Dear Ms. Goodvin:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2016.0059 for Quest Aircraft Company, LLC, located at Sandpoint, for the Initial PTC for an aircraft coating operation. 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 October 20, 2016.

This permit is effective immediately. This permit does not release Quest Aircraft Company, LLC 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 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 Tom Burnham at (208) 373-0502 or tom.burnham@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\tb
Permit No. P-2016.0059 PROJ 61799
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Quest Aircraft Company, LLC
Permit Number P-2016.0059
Project ID 61799
Facility ID 017-00067
Facility Location 1200 Turbine Drive
Sandpoint, ID 83864

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 June 14, 2017



Tom Burnham, Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This is the initial permit to construct (PTC) for an existing aircraft coating operation.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	<u>Manufacturing Building Boiler 1</u> Manufacturer: Viessmann Model: VSB-28 Serial#: 7223357400104 Heat input rating: 1.0 MMBtu/hr Manufacture Year: 2004	None
2	<u>Manufacturing Building Boiler 2</u> Manufacturer: Fonderie Sime Model: RS-8 Serial#: 7133837-00046 Heat input rating: 0.55 MMBtu/hr Manufacture Year: 2001	None
2	<u>Customer Service Building Boilers 3 and 4</u> Manufacturer: Munchkin Model: 199M Serial#: H30J0636 and H30J0637 Heat input rating: 0.199 MMBtu/hr each Manufacture Year: 2003	None
2	<u>Engineering Building Boiler 2</u> Manufacturer: Gordan Ray Model: BH-150 Serial#: 0311-071-150-0049 Heat input rating: 0.15 MMBtu/hr Manufacture Year: 2003	None
2	<u>Make-up air unit, Paint Booth 2</u> Manufacturer: Global Finishing Solutions (GFS) Model: RAM-25 Heat input rating: 2.3 MMBTU/hr Manufacture Year: 2016	None
2	<u>Make-up air unit for Cure Booth</u> Manufacturer: Global Finishing Solutions (GFS) Model: RAM-20 Heat input rating: 1.5 MMBTU/hr Manufacture Year: 2017	None

Table 1.1 Regulated Sources (continued)

<p>3</p>	<p><u>Paint Booth: PB1</u> Manufacturer – Col-Met Construction Date: 2006 Note: Make-up Air: Electric</p>	<p><u>Paint Spray Booths</u> down draft Filter, Control Efficiency: 98% or greater</p> <p><u>Spray Gun:</u> Manufacturer: SATAjet Model: 4000B Type: HVLP Transfer Efficiency: >65%</p> <p><u>Spray Gun:</u> Manufacturer: SATAjet Model: 3000K Type: HVLP Transfer Efficiency: >65%</p>
<p>3</p>	<p><u>Paint Booth: PB2</u> Manufacturer: Global Finishing Solutions (GFS) Construction Date: June 2016</p>	<p><u>Spray Gun:</u> Manufacturer: SATAjet Model: 100BF Type: HVLP Transfer Efficiency: >65%</p>
<p>3</p>	<p><u>Cure Booth</u> Manufacturer: Global Finishing Solutions (GFS) Construction Date: June 2016</p>	<p>None</p>

2 Combustion Units

2.1 Process Description

There are seven natural gas-fired combustion sources at the facility utilized for building heat and drying surfaces. Boilers in the customer service buildings and engineering building are used only for heat and hot water.

2.2 Control Device Descriptions

Table 2.1 Combustion Units

Emissions Units / Processes	Control Devices	Emission Points
Manufacturing Building Boiler 1	None	Boiler 1 exhaust
Manufacturing Building Boiler 2	None	Boiler 2 exhaust
Customer Service Building Boilers 3 and 4	None	Boiler 3 and 4 exhausts
Engineering Building Boiler 2	None	Engineering building boiler 2 exhaust
Make-up air unit, Paint Booth 2	None	Make-up air unit exhaust, Paint booth 2
Make-up air unit for Cure Booth	None	Make-up air unit exhaust, Cure booth

Emission Limits

2.3 Opacity Limit

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

Operating Requirements

2.4 Fuel Usage

The rolling 12 calendar month natural gas used by the facility shall not exceed 54.13 million standard cubic feet per year (MMscf/yr). The make-up air and boilers shall only combust natural gas fuel.

Monitoring and Recordkeeping Requirements

2.5 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) plus the previous 11 calendar months (scf/yr) to demonstrate compliance with the Fuel Usage limit.

3 Aircraft Coating Operations

3.1 Process Description

The airplanes are manufactured in an assembly line consisting of metal fabrication, chem-film, painting, assembly, and equipment testing. More specifically, machined aircraft parts are rolled into the paint booth on carts and an aircraft primer (PPG primer, epoxy primer, or fuel tank primer) is sprayed by a paint employee. Carts are rolled back out and parts are dried for up to 14 days for parts with fuel tank primer. Most other primed or painted parts need to set for 7 days. Landing gear, nose gear, composite parts, and aircraft doors are also painted in the paint booth with aircraft paint. Primed or painted parts are taken to Inventory and added as a stockroom item. Stockroom fills carts of aircraft parts and delivers to each stage for aircraft manufacturing. The Kodiaks are built using rivets and fully assembled on-site.

3.2 Control Device Descriptions

Table 3.1 Aircraft Coating Equipment Description

Emissions Units / Processes	Control Devices	Emission Points
Col-Met Paint Booth PB1	HPLV Spray guns. Filters 98% control efficiency	EASTRIGHT and EASTLEFT
GFS Paint Booth PB2	Filter 98% control efficiency	WESTRIGHT and WESTLEFT
GFS Cure Booth	None	CURE 1

Emission Limits

3.3 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.

3.4 Opacity Limit

Emissions from the stacks or functionally equivalent openings 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.

3.5 Hazardous Air Pollutant (HAP) Limits

Emissions of aggregate Hazardous Air Pollutants (HAPs) from the aircraft coating operations, including but not limited to HAPs emissions from paints, primers, and cleaners, shall not exceed 6.09 tons per any consecutive 12-calendar month period.

3.6 Coating VOC Limit

Each month the total VOC from the aircraft coating operations, including but not limited to emissions from paints, primers, and cleaners, shall not exceed 3.98 tons per any consecutive 12-month period.

Operating Requirements

3.7 Coating Usage

The maximum allowable annual usage of each individual material shall not exceed the limits listed in Table 3.2 Coating usage for any 12-month consecutive period:

Table 3.2 Coating usage

Individual Material	Maximum Annual Use (gallons)
513X384 Primer	1067
513X419 Epoxy Primer	111
823-011 Fuel Tank Primer	444
528X310 Base Component	111
Polane Enamel, Black, Sherwin Williams	27
CA8800 1073	16
CA8800 3017	2
CA8800/B701 Base Component	7
Polane Enamel Stucco, Sherman Williams	7
Tile Clad II, Gray Primer	9

The permittee may use alternate coatings and solvents that are not specifically listed in Table 3.2 provided:

- that the use of the alternate coating or solvent qualifies for an exemption from the need to obtain a permit to construct as specified at IDAPA 58.01.01.220-223, or
- that the use of the alternate coating or solvent is limited to quantities that would result in toxic air pollutant emissions equal to or below the screening emissions level (EL) listed in IDAPA 58.01.01.585 & 586, effective on the date of initial usage.

3.8 Spray Gun and Spray Booth Filter System

- All coating at this facility shall be conducted within the booth area, with filter system in place, and exhaust fans operating.
- All painting shall be conducted with HVLP spray equipment with 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 with a minimum control efficiency of 98% for PM₁₀ emissions as documented by the filter manufacturer.
- The permittee shall have developed an Operation and Maintenance (O&M) Manual for the spray booth filter system. The O&M Manual shall describe the procedures that will be followed to ensure that all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit are at all times (except as provided in the "Rules for the Control of Air Pollution in Idaho") maintained in good working order and operated as efficiently as practicable to meet the manufacturer's air pollution control device specifications. This manual shall remain on-site at all times and shall be made available to DEQ representatives upon request.

- The permittee shall follow the operation and maintenance manual which will include the manufacturers specifications and procedures used to determine when replacement of the filters are required to maintain the 98% efficiency.
- The permittee shall keep a record of the date and time filters are inspected, date and time the filters are changed and the method used to determine when the change was necessary, and documentation of filter manufacturer name & model that was installed at the time of change.

Monitoring and Recordkeeping Requirements

3.9 Odor Complaints

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.

3.10 Daily Coating Usage Records

Using the purchase records and material usage records, the permittee shall monitor and record the gallons of coatings specified in Section 3.7 sprayed daily in order to demonstrate compliance with the Table 3.2 Coating usage.

3.11 Calculating TAPs for Alternative Coatings

Prior to using alternate coatings not specified in Table 3.2 the permittee shall generate documentation that shows that the use of the alternate coating or solvent qualifies for an exemption in accordance with IDAPA 58.01.01.220.02; or calculate the amount of alternate coating or solvent containing 585 TAPs that may be used per calendar day and containing 586 TAPs that may be used per calendar month by using the following equations:

- For 585 TAPs that are volatile: $\text{Gallons/day} = [\text{EL} / (\text{TAP}\% / 100 \times \text{coating or solvent density})] \times 24$
- For 585 TAPs that are particulate: $\text{Gallons/day} = [\text{EL} / (\text{TAP}\% / 100 \times \text{coating or solvent density} \times (100\% - 35\% / 100) \times (100\% - 98\% / 100))] \times 24$
- For 586 TAPs that are volatile: $\text{Gallons/month} = [\text{EL} / (\text{TAP}\% / 100 \times \text{coating or solvent density})] \times (8760 / 12)$
- For 586 TAPs that are particulate: $\text{Gallons/month} = [\text{EL} / (\text{TAP}\% / 100 \times \text{coating or solvent density} \times (100\% - 35\% / 100) \times (100\% - 98\% / 100))] \times (8760 / 12)$

Where:

Gallons/day = the amount of coating or solvent that may be used per calendar day

Gallons/month = the amount of coating or solvent that may be used per calendar month

EL = TAP allowable pounds per hour emission rate listed in IDAPA 58.01.01.585 or 586

TAP% = the percentage of toxic air pollutant contained in the coating or solvent as given by the manufacturer

Density = the density of the coating or solvent in pounds per gallon

3.12 Daily Monitoring of Alternative Coatings

The permittee shall monitor and record the gallons of alternate coatings used each day that contain 585 TAPs and 586 TAPs. The gallons/day of alternate coatings that contain TAPs would be divided by 24-hours to demonstrate that the use of alternate coatings did not exceed the maximum daily amounts calculated using the equations in the Calculating TAPs for Alternative Coatings permit condition.

3.13 Documentation of Alternative Coatings Records

Records of material safety data sheets (MSDS) or safety data sheets (SDS) for all TAP containing materials used for the coating operation shall be maintained onsite.

- If the MSDS or SDS for a material lists a range for a specific TAP content, then calculations shall use the highest value in the range.
- If the proposed daily use of alternate coatings with any of the individual non-carcinogenic TAPs or monthly use of individual carcinogenic TAPs calendar day total exceed the screening emissions level (EL) specified in IDAPA 58.01.01.585 or IDAPA 58.01.01.586, a modeling analysis shall be conducted to demonstrate that the amounts of alternate coatings comply with the acceptable ambient concentration (mg/m^3) (for TAPs listed in IDAPA 58.01.01.585 and IDAPA 58.01.01.586).
- Documentation of all calculations and modeling analysis shall be maintained on-site in accordance with General Provisions of this permit.

Reporting Requirements

3.14 Reporting Requirement

Each year the permittee shall submit a report by May 1st on all TAP modeling analyses that have been conducted during the previous 12 month period. The report shall document the analyses with sufficient detail, including documentation of all calculations and electronic copies of modeling files, so that DEQ can verify the analysis. The report shall be sent to:

DEQ State Office
Air Quality Division
1410 N. Hilton
Boise, ID 83706

The report shall be titled: Quest Aircraft Company, LLC – Permit Required Modeling Report.

40 CFR 63 Subpart HHHHHH Requirements

3.15 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, General Compliance Requirements

In accordance with 40 CFR 63.11172(a)(2) and IDAPA 58.01.01.210, on and after the date of initial startup of this facility the permittee shall comply with the 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.
- The permittee shall 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. 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.

3.16 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Applicability of General Provisions

The parts of the General Provisions which apply to the permittee are specified in Table 3., in accordance with 40 CFR 63.11174(a).

Table 3.3 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	

3.17 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Recordkeeping

In accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of this facility 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), (b), (d), (g), and (h) as applicable.
 - 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)(3)(i).
 - 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.

- 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.

3.18 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Reports

In accordance with 40 CFR 63.11172(a)(2), on and after the date of initial startup of this facility 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, Mail Stop: OAW-150
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

and,

DEQ Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
fax: (208) 769-1404

3.19 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.

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]