



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

August 9, 2017

Tommy S. Young, Owner
Young's Heavy Equipment
P. O. Box 5068
Boise, ID 83705

RE: Facility ID No. 001-00279, Young's Heavy Equipment, Boise
Final Permit Letter, DEQ Initiated Permit Reissuance

Dear Mr. Young:

The Department of Environmental Quality (DEQ) is reissuing Permit to Construct (PTC) No. P-2017.0017, Project 61925, to Young's Heavy Equipment which contained some permit condition errors. The errors were in Section 3 the abrasive blasting section regarding filtering and in the paint limit Permit Conditions 4.5 and 4.6 regarding limits for individual topcoats. These errors have been corrected.

This permit is effective immediately and replaces PTC No. P-2017.0017, issued on July 10, 2017. This permit does not release Young's Heavy Equipment from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. The accompanying Statement of Basis documents the corrections to the initial permit.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Thomas Krinke, Air Quality 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 Tom Burnham at (208) 373-0477 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
Enclosure
Permit No. P-2017.0017 Project 61925

Air Quality

PERMIT TO CONSTRUCT

Permittee Young's Heavy Equipment
Permit Number P-2017.0017
Project ID 61925
Facility ID 001-00279
Facility Location 209 E. Amity Road
Boise, ID 83705

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 August 9, 2017



Tom Burnham, Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) permit reissuance to correct errors in the recently issued initial permit.
- 1.2 This PTC replaces Permit to Construct No. P-2017.0017, issued on July 10, 2017.

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>Heater1</u> Manufacturer: Heatstream Model: HS-215T-KFA Fuel: Kerosene Capacity: 1.63 gal/hr Date Purchased: 2016	None
2	<u>Heater2</u> Manufacturer: GHP-Group, Inc. Model: Dyna-glo Pro Fuel: Kerosene Capacity: 1.66 gal/hr Manufactured date: unknown	None
3	<u>Abrasive Blast - MB1</u> Manufacturer: Clemco Capacity: 600 lb pot Date Purchased: 1988	None
3	<u>Compressor Engine 1</u> Model: Sullivan Industries 185 bhp Fuel: distillate fuel oil, 500 ppm sulfur Tier certification number: JDX-NR5-00-16 Date manufactured: 2000	None
3	<u>Compressor Engine 2</u> Model: LeROI 185 bhp Fuel: distillate fuel oil, 500 ppm sulfur Tier certification number: none Date manufactured: 1994	None
3	<u>Compressor Engine 3</u> Model: Ingersoll Rand 185 bhp Fuel: distillate fuel oil, 500 ppm sulfur Tier certification number: JDX-NR-04-15 Date manufactured: 2003	None
4	<u>Paint Booth: PB1</u> Manufacturer – Custom Model: Large Construction Date: 2009 Filter, Control Efficiency: 98.0% or greater <u>Paint Booth: PB2</u> Manufacturer: Custom Model: Small Construction Date: 2009 Filter, Control Efficiency: 98.0% or greater	<u>Paint Booth filter media</u> Manufacturer – Viledon Model: 200 Filter, Control Efficiency: 98.0% or greater <u>Spray Guns:</u> Manufacturer: Awest Iwata Model: LPH-200 Type: HVLP Transfer Efficiency: 65%
4	<u>SR1 Solvent Recycle</u> Model: RS-20 Serial Number: 15072 Capacity: 10 gal	None

2 Kerosene Heaters

2.1 Process Description

There are two kerosene-fired combustion sources at the facility utilized for building heat, booth heat, and drying surfaces.

2.2 Control Device Descriptions

Table 2.1 Combustion Sources Description

Emissions Units / Processes	Control Devices	Emission Points
Heater1	None	Building windows, doors, and vents
Heater2	None	Building windows, doors, and vents

2.3 Opacity Limit

Emissions from the Heater1 and Heater2 stacks, or any other stack, vent, or functionally equivalent opening associated with the combustion sources, 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 kerosene combusted by the facility shall not exceed 8,225 gallons.

Monitoring and Recordkeeping Requirements

2.5 Fuel Usage Monitoring

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

3 Abrasive Blast Operations

3.1 Process Description

Abrasive Blasting is performed to prepare surfaces for coating in an enclosed paint booth. The process is initially charged 300-600 lb. of crushed glass abrasive.

3.2 Control Device Descriptions

Table 3.1 Abrasive Blasting Description

Emissions Units / Processes	Control Devices	Emission Points
CLEMCO Media Blast - MB1	None	Fugitive
Compressor Engine 1	None	Engine 1 exhaust
Compressor Engine 2	None	Engine 2 exhaust
Compressor Engine 3	None	Engine 3 exhaust

Emission Limits

3.3 Opacity Limit

Emissions from the Compressor engines 1-3 or any other stack, vent, or functionally equivalent opening associated with abrasive blasting, 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

3.4 Compressor Engine Fuel

In accordance with IDAPA 58.01.01.725, the permittee shall not use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 2 fuel oil – 0.5% sulfur by weight

3.5 Compressor Engine Fuel Monitoring

The permittee shall maintain fuel oil supplier certification records that contain the following:

- A statement from the fuel oil supplier that the fuel oil complies with the specifications ASTM D 396-05, Grade No. 2, and;
- The sulfur content of the oil from which the shipment came (or of the shipment itself)

3.6 Abrasive Blasting Media Operation

- Daily spraying of abrasive blasting media shall not exceed 12 hours for all spray guns combined in a 24 hour day.
- Blasting media shall be crushed glass or equivalent, with HAP and TAP content less than new crushed glass.

3.7 Abrasive Blasting Media Monitoring

Each calendar day, the permittee shall monitor and record hours of abrasive media blasting performed by each spray gun used at the facility. The total hours of blasting for all spray guns combined shall not exceed 12 hours in any consecutive 24 hour period.

3.8 O&M Manual

The permittee shall develop and maintain an Operation and Maintenance (O&M) manual, including best management practice (BMP) for outdoor abrasive blasting, within 60 days of permit issuance. The O&M Manual shall describe the procedures that will be followed to ensure that all 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 operating specifications and minimize fugitive emissions. This manual shall remain on-site at all times and shall be made available to DEQ representatives upon request.

4 Coating Operations

4.1 Process Description

All painting is performed in one of two paint booths, sized differently to accommodate the different heavy equipment sizes. Exhaust air from the booths is pulled through a shared filter room located between the two booths.

4.2 Control Device Descriptions

Table 4.1 Coating Operations Description

Emissions Units / Processes	Control Devices	Emission Points
Paint Booth	<u>Spray Gun:</u> Awest Awata Model: LPH-200 HVLP Transfer efficiency: 65% <u>Filter media:</u> Filter: Viledon200 Filter Efficiency: 98 %	B1
Solvent Recycling	None	B1

Emission Limits

4.3 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.

4.4 Daily Coating Emission Limits

Emissions from all coating operations shall not exceed the emission rate limits in Table 4.2.

Table 4.2 Coating Operation Emission Limits ^(a)

Source Description	PM _{2.5} ^(b)	VOC ^(c)	Individual HAP ^(d)		Total HAP ^(e)	
	lb/day ^(f)	lb/day ^(f)	lb/day ^(f)	T/Yr ^(g)	lb/day ^(f)	T/Yr ^(g)
Coating Operations	4.4	352.4	61.2	7.65	140.1	17.5

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) PM with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM_{2.5}), including condensable PM as defined in IDAPA 58.01.01.006.
- c) Volatile organic compounds (VOC).
- d) Emission limit for any single hazardous air pollutant (HAP).
- e) Emission limit for total of all HAP (combined).
- f) Worst-case pounds of emissions from all coating operations per calendar day (combined), as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.
- g) Based on annual potential to emit (PTE) gallons per year for all paints

Operating Requirements

4.5 Approved Daily Coating Usage Scenario

Unless the permittee is complying with an Alternate Daily Usage Scenario which demonstrates compliance with Coating Operation Emission Limits and Coating Operation Screening Emission Rates and Modeled Concentration Limits, the permittee shall comply with the daily coating material usage limits in Table 4.3.

Table 4.3 Approved Daily Usage Scenario

Coating Material	Daily Usage Limit (gal/day) ^(a)
Kem Flash 500 Primer Gray	15.00
Kem Flash 500 Primer White	15.00
Polyurethane LIC40	15.00
Urethane Activator LK40	15.00
Xylene thinner for Paint	5.00
Valspar recycled lacquer thinner for primer Like: Uni-Solvent Reducer/Thinner 171/172/173	5.00
Composite Finish Paint ^(b)	15.00

- a) Gallons per calendar day
- b) Composite Finish Paint shall include the summation of daily usage of High Gloss Enamel White Base F75WC7, Raven Black BC14, Safety Yellow B54Y37, Equipment Yellow F75YC19 (John Deere yellow), Gray F75WC7, Safety Red B54 R38, and F75CC2 Yellow (CAT yellow).

4.6 Annual Coating Usage Limits

The permittee shall not exceed the annual coating material usage limits in Table 4.4.

Table 4.4 Annual Usage Limits

Coating Material	Annual Usage Limit (gal/yr) ^(a)
Kem Flash 500 Primer Gray	3750
Kem Flash 500 Primer White	3750
Polyurethane LIC40	3750
Urethane Activator LK40	3750
Xylene thinner for Paint	1250
Valspar recycled lacquer thinner for primer Like: Uni-Solvent Reducer/Thinner 171/172/173	1250
Composite Finish Paint ^(b)	3750

- a) Gallons per rolling consecutive 12-calendar-month period.
- b) Composite Finish Paint shall include the summation of daily usage of High Gloss Enamel White Base F75WC7, Raven Black BC14, Safety Yellow B54Y37, Equipment Yellow F75YC19 (John Deere yellow), Gray F75WC7, Safety Red B54 R38, and F75CC2 Yellow (CAT yellow).

Alternate Daily Coating Usage Scenarios

If the permittee proposes to use coating materials other than those listed in Tables 4.3 and 4.4 (such as when new or reformulated coating materials are introduced), the permittee shall follow the procedures of this section. The permittee shall not use any Daily Usage Scenario until TAP compliance and Emission Limit compliance have been demonstrated for that Scenario according to the procedures below.

4.7 Propose a Daily Coating Usage Scenario

Prior to using or implementing a Daily Usage Scenario:

- The permittee shall propose and record maximum daily usage limits for each coating material that will be used in the Scenario, in gallons per day (gal/day). The permittee shall not use or implement any Scenario that does not have recorded maximum daily usage limits.
- The permittee shall estimate emissions of PM_{2.5}, VOC, individual HAP, total HAP, and all TAP listed in Table 4.5 for the Scenario (lb/day for each pollutant), using the procedures described below for estimating emissions.
- The permittee shall demonstrate TAP compliance for the Scenario, using the procedures described below for demonstrating TAP compliance. The permittee shall not use or implement any Scenario that does not demonstrate TAP compliance.
- The permittee shall demonstrate Emission Limit compliance for the Scenario, using the procedures described below for demonstrating Emission Limit compliance. The permittee shall not use or implement any Scenario that does not demonstrate Emission Limit compliance.
- The coating daily usage limits and emission estimates used in the TAP and Emission Limit compliance demonstrations shall be based on estimated emissions from all coatings to be used from all coating operations at the facility (i.e., facility-wide).

4.8 Estimate Coating TAP Emissions

TAP emissions shall be estimated for all TAP listed in Table 4.5:

- Emissions shall be estimated by multiplying each coating maximum daily usage rate (gal/day) by the TAP content (lb/gal) of that coating, and summing the total emissions from all coatings (lb/day). TAP emissions which are designated as a particulate in Table 4.5 may also be multiplied by one minus the documented spray gun transfer efficiency and by one minus the documented filtration system control efficiency when control equipment will be applied to such emissions.
- TAP content (lb/gal) of a coating is specified on the Safety Data Sheet (SDS) for that coating, or shall be calculated by multiplying the weight percentage of TAP (%) by the density (lb/gal) of the coating from the SDS.
- For TAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the TAP content is below detection and cannot be determined from SDS or other documentation, the TAP content shall be assumed to be the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.

4.9 Demonstrate Coating TAP Compliance

For each Daily Usage Scenario, emissions shall be estimated and compared against the TAP Screening Emission Rates or Modeled Concentration Limits in Table 4.5:

- The permittee shall compare estimated TAP emissions for all coatings against the Screening Emission Rates in Table 4.5. For emissions equal or less than the Screening Emission Rate, modeling analyses is not required. For emissions in excess of the Screening Emission Rate, modeling analyses is required to determine the maximum modeled concentration.

- Modeled emissions from all coating operations for a Daily Usage Scenario shall not exceed the Modeled Concentration Limits in Table 4.5. The permittee shall not use or implement any Scenario that exceeds a Modeled Concentration Limit.
- All modeling analyses shall use EPA-approved models and follow relevant guidance in the most recent version of the “State of Idaho Guideline for Performing Air Quality Impact Analyses,” available for download at DEQ’s website.

Table 4.5 TAP Screening Emission Rates and Modeled Concentration Limits

			Screening Emission Rate ^(a)	Modeled Concentration Limit ^(b)
Regulated TAP	CAS	Particulate?	(lb/day)	(mg/m ³)
Acetone	67-64-1	No	2856	89
Aluminum - Metal and Oxide	7429-90-5	Yes	16.008	0.5
Aluminum - Soluble Salts	7429-90-5	Yes	3.192	0.1
Barium (Soluble Compounds), as Ba	7440-39-3	Yes	0.792	0.025
2-Butoxyethanol	111-76-2	No	192	6
Calcium Carbonate	1317-65-3	Yes	16.008	0.5
Carbon Black	1333-86-4	Yes	5.52	0.175
Cyclohexane	110-82-7	No	1680	52.5
Cyclohexanone	108-94-1	No	160.08	5
Diacetone Alcohol	123-42-2	No	384	12
Dibutyl Phthalate	84-74-2	No	7.992	0.25
Diethyl Phthalate	84-66-2	No	7.992	0.25
Diisobutyl Ketone	108-83-8	No	232.08	7.25
Dimethylphthalate	131-11-3	No	7.992	0.25
Dipropylene Glycol Methyl Ether	34590-94-8	No	960	30
Ethyl Acetate	141-78-6	No	2239.2	70
Ethyl Alcohol	64-17-5	No	3000	94
Heptane (n-Heptane)	142-82-5	No	2616	82
Iron Oxide Fume (Fe ₂ O ₃) as Fe	1309-37-1	Yes	7.992	0.25
Isobutyl Acetate	110-19-0	No	1120.8	35
Isobutyl Alcohol	78-83-1	No	240	6
Isophorone Diisocyanate	4098-71-9	No	0.144	0.0045
Isopropyl Acetate	108-21-4	No	1663.2	52
Isopropyl Alcohol	67-63-0	No	1567.2	49
Kaolin	1332-58-7	Yes	3.192	0.1
Magnesite	546-93-0	Yes	16.008	0.5
Methyl Acetate	79-20-9	No	976.8	30.5
Methyl Ethyl Ketone (MEK)	78-93-3	No	943.2	29.5
Methyl Isoamyl Ketone	110-12-3	No	384	12
Methyl Isobutyl Carbinol	108-11-2	No	166.32	5.2
Methyl n-Amyl Ketone	110-43-0	No	376.8	11.75
Methyl Propyl Ketone	107-87-9	No	1120.8	35

Mica (Respirable Dust)	12001-26-2	Yes	4.8	0.15
Molybdenum as Mo	7439-98-7	Yes	7.992	0.25
n-Amyl Acetate	628-63-7	No	847.2	26.5
n-Butyl Acetate	123-86-4	No	1135.2	35.5
n-Butyl Alcohol	71-36-3	No	240	7.5
Nonane	111-84-2	No	1680	52.5
n-Propyl Acetate	109-60-4	No	1344	42
o-Dichlorobenzene	95-50-1	No	480	15
Pentane	109-66-0	No	2832	88.5
Phosphoric Acid	7664-38-2	No	1.608	0.05
Propionic Acid	79-09-4	No	48	1.5
Propyl Alcohol	71-23-8	No	799.2	25
Silica - Amorphous	112926-00-8	Yes	16.008	0.5
Silica - Crystalline - Cristobalite	14464-46-1	Yes	0.0792	0.0025
Silica - Crystalline Quartz & Fused Silica	14808-60-7	Yes	0.1608	0.005
Stoddard Solvent	8052-41-3	No	840	26.25
Tetrahydrofuran	109-99-9		943.2	29.5
Trimethyl Benzene (Mixed and Individual Isomers)	25551-13-7	No	196.8	6.15
VM&P Naphtha	8032-32-4	No	2191.2	68.5
Zinc	7440-66-6	Yes	16.008	0.5
Zinc Oxide Dust	1314-13-2	Yes	16.008	0.5

- a) Worst-case pounds of emissions from all coating operations (combined) per day, as calculated using procedures in this permit to estimate TAP emissions, or as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.
- b) Milligrams of toxic air pollutant (TAP) per cubic meter, modeling proposed emission rates calculated using a daily averaging period.

4.10 Demonstrate Coating Emission Limit Compliance

For each Daily Usage Scenario, emissions from all coating operations shall be estimated and compared against the Emission Limits in Table 4.2:

- PM_{2.5} emissions shall be estimated by multiplying each coating maximum daily usage rate (gal/day) by the solids content (lb/gal) of that coating, and summing the total emissions from all coatings (lb/day). Emissions may also be multiplied by one minus the transfer efficiency and by one minus the filter control efficiency when control equipment will be applied to such emissions.
- VOC emissions shall be estimated by multiplying each coating maximum daily usage rate (gal/day) by the VOC content (lb/gal) for that coating, and summing the total emissions from all coatings (lb/day).
- HAP emissions shall be estimated by multiplying each coating maximum daily usage rate (gal/day) by the HAP content (lb/gal) for that coating, and summing the total emissions from all coatings (lb/day).
- For solids content, VOC content, HAP content, and TAP content, if a range is presented on the SDS for a coating, the highest value of the range shall be used when estimating emissions.
- When the solids content, VOC content, HAP content, or TAP content cannot be determined from SDS or other documentation, the density of the coating (lb/gal) shall be used when

estimating emissions.

- The permittee shall compare estimated emissions for all coatings against the Emission Limits in Table 4.2. The permittee shall not use or implement any Scenario that exceeds an Emission Limit.

Monitoring Requirements

4.11 Coating Usage Scenario Monitoring

Each calendar day that coating operations are conducted, the permittee shall select and record the Daily Usage Scenario that will be used for that day, and comply with the maximum daily coating usage limits specified for the selected Daily Usage Scenario.

- Only one Daily Usage Scenario may be used each calendar day.
- The permittee shall not exceed any daily coating usage limit for the Scenario chosen that calendar day.
- The permittee shall maintain documentation such as coating material SDS, manufacturer's specification sheets that support filter control efficiencies, transfer efficiencies, capture efficiencies, and other engineering assumptions relied upon in emission calculations.

4.12 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.

Reporting Requirements

4.13 Coating Usage Scenario Reporting

Each year, the permittee shall submit a report by May 1st on all Daily Usage Scenarios used each calendar day during the previous 365-day period. The report shall include documentation supporting the TAP compliance evaluations and the Emission Limit compliance evaluations relied upon for each Daily Usage Scenario, and any modeling analyses conducted in the TAP compliance evaluation. Documentation should be in sufficient detail, including documentation of all calculations and electronic copies of modeling files, such that DEQ can verify the analysis. The report shall be titled “Permit-Required Modeling Report” and shall be sent to:

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

4.14 Material Purchase Records and Safety Data Sheets

For each material used at the facility, including but not limited to primers, stains, enamels, , thinners, solvents, reducers, activators, and composites, the permittee shall record and maintain the following records:

- Material purchase records
- Safety Data Sheets (SDS)

40 CFR 63 Subpart HHHHHH Requirements

4.15 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 EPA has been granted to this facility 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.

4.16 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Applicability of General Provisions

Unless an exemption from EPA has been granted to this facility the parts of the General Provisions which apply to the permittee are specified in Table 4.6, in accordance with 40 CFR 63.11174(a).

Table 4.6 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	

4.17 40 CFR 63, Subpart HHHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Recordkeeping

Unless an exemption from EPA has been granted to this facility 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 HHHHHHH.

- 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.

4.18 40 CFR 63, Subpart HHHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Reports

Unless an exemption from EPA has been granted to this facility 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 HHHHHHH.

- 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 Boise Regional Office
1445 N. Orchard St.
Boise, ID 83706
fax: (208) 373-0287

4.19 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.

5 General Provisions

General Compliance

5.1 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.]

5.2 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]

5.3 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

5.4 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

5.5 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]

5.6 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

- 5.7 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.
- 5.8 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.
- 5.9 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

- 5.10 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

- 5.11 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

- 5.12 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

- 5.13 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

- 5.14 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

- 5.15 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

- 5.16 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]