



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

September 26, 2016

Kevin Bennett, Operations Manager  
Interstate Group, LLC  
224 Carnation Drive  
Nampa, ID 83687

RE: Facility ID No. 027-00153, Interstate Group, LLC, Nampa  
Final Permit Letter

Dear Mr. Bennett:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2016.0032 Project 61730 to Interstate Group, LLC located at Nampa for the transfer of an existing manufacturing facility to a new location. 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 June 17, 2016.

This permit is effective immediately. This permit does not release Interstate Group, LLC 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, Boise, ID 83706, 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, 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 Kelli Wetzal at (208) 373-0502 or [kelli.wetzal@deq.idaho.gov](mailto:kelli.wetzal@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

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

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\KW

Permit No. P-2016.0032 PROJ 61730

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** Interstate Group, LLC  
**Permit Number** P-2016.0032  
**Project ID** 61730  
**Facility ID** 027-00153  
**Facility Location** 605 N. 39th St.  
Nampa, ID 83687

### Permit Authority

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

**Date Issued** September 26, 2016

  
Kelli Wetzel, 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 facility that has transferred most of its existing equipment to a new location.

## 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	Makeup Air Unit Rated Capacity: 1.925 MMBtu/hr Allowable fuel type: natural gas	None
2	Ten Unit Heaters Rated Capacity: 0.035 MMBtu/hr each Allowable fuel type: natural gas only	None
3	Painting Operations Paint Booth HVLV spray gun transfer efficiency: 65% Rated Capacity: 4.7 gal/hr	Fiberglass Exhaust Filters PM <sub>10</sub> control efficiency: 98.65%
3	Undercoating Paint Booth Airless spray gun transfer efficiency: 40%	Fiberglass Exhaust Filters PM <sub>10</sub> control efficiency: 96%

## 2 Facility-Wide Conditions

### Fugitive Dust Emissions

#### 2.1 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, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts. Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

#### 2.2 Responsible Control Measures

- The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- The permittee shall conduct a weekly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any

corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

## **Odors**

### **2.3 Odors**

In accordance with IDAPA 58.01.01.776.01, the permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere in such quantities as to cause air pollution.

### **2.4 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.

## **Visible Emissions**

### **2.5 Opacity Limit**

Emissions from any stack, vent, or functionally equivalent opening associated with the trailer manufacturing process, 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.

### **2.6 Visible Emissions Inspections**

The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

## **Fuel-Burning Equipment**

### **2.7 Emission Limit**

The permittee shall not discharge to the atmosphere from any fuel burning equipment with a maximum rated input of less than ten million BTU per hour , PM in excess of 0.015 gr/dscf corrected to 3% oxygen, in accordance with IDAPA 58.01.01.676-677.

### **2.8 Fuel Type Restriction**

All fuel burning equipment listed in Table 1.1 shall be fired on natural gas exclusively.

## **Reports and Certifications**

### **2.9 Reporting Requirement**

Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1445 N Orchard  
Boise, Idaho 83706  
Phone: (208) 373-0550  
Fax: (208) 373-0287

## **Obligation to Comply**

### **2.10 Compliance Requirement**

Receiving a PTC shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations. The permittee shall document compliance with the Rules when using new materials containing new toxic air pollutants (TAP) or hazardous air pollutants (HAP).

## **Incorporation of Federal Requirements**

### **2.11 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), 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 NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

### 3 Paints and Coatings

#### 3.1 Process Description

Over-the-road trailers of various sizes are welded, painted in a paint booth, finished with a plywood floor and interior surfaces and trim, and the frame is undercoated.

#### 3.2 Control Device Descriptions

Table 3.1 Paints and Coatings Description

Emissions Units / Processes	Control Devices
Painting Operations Paint Booth HVLV spray gun transfer efficiency: 65% Rated Capacity: 4.7 gal/hr	Fiberglass Exhaust Filters PM <sub>10</sub> control efficiency: 98.65%
Undercoating Paint Booth Airless spray gun transfer efficiency: 40%	Fiberglass Exhaust Filters PM <sub>10</sub> control efficiency: 96%

### Emission Limits

#### 3.3 Emission Limits

The PM<sub>10</sub> and VOC emissions from the painting operations paint booth and the undercoating paint booth shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Painting Operations Emission Limits

Source Description	PM <sub>10</sub> <sup>(b)</sup>		VOC	
	lb/mo	T/yr <sup>(c)</sup>	lb/mo	T/yr <sup>(c)</sup>
Painting Operations Paint Booth	30.0	0.18	3797	22.78
Undercoating Paint Booth	55.0	0.33	882	5.29

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Tons per any consecutive 12-calendar month period.

### Operating Requirements

#### 3.4 VOC Emissions Calculations

The permittee shall monitor and record VOC emissions on monthly basis to demonstrate compliance with the Emission Limits permit condition. The monthly calculations shall be made in lb/mo and converted to T/yr. Annual emissions calculations shall represent any consecutive 12 month period. The VOC emissions shall be calculated using the following equation:

$$VOC = \sum_{i=1}^n (X_i \times Y_i)$$

Where:

- VOC = Emissions of VOC per month and year (lb/mo, T/yr)
- n = Number of compounds used
- X<sub>i</sub> = Usage of compound i per month and year (lb/mo, T/yr)
- Y<sub>i</sub> = Weight percent of VOC contained in compound i

Note: *Compound* refers to any paint, adhesive, solvent, or any other solid containing chemicals.

### 3.5 PM<sub>10</sub> Emissions Calculations

The permittee shall monitor and record PM/PM<sub>10</sub> emissions on a monthly basis to demonstrate compliance with the Emission Limits permit condition. The monthly calculations shall be made in lb/mo and converted to T/yr. Annual emissions calculations shall represent any consecutive 12 month period. The PM and PM<sub>10</sub> emissions shall be calculated using the following equation:

$$PM = \left( \sum_{i=1}^n [i \times p] \right) \times TE \times FE$$

Where:

PM	=	Emissions of particulate matter PM or PM <sub>10</sub> per month and year (lb/mo, T/yr)
I	=	Usage of compound i per day and/or per year (lb/day, T/yr)
n	=	Number of compounds used
p	=	percent solids by weight in compound I (% solids)
TE	=	40% (0.60) transfer efficiency for undercoating or 35% (0.65) transfer efficiency in paint booth
FE	=	96% (0.04) filter efficiency for undercoating or 98.65% (0.0135) filter efficiency in paint booth

Note: *Compound* refers to any paint, adhesive, solvent, or any other solid containing chemicals.

### 3.6 Material Usage Limit

During coating or painting operations, the permittee shall not exceed the following usage limits of paint, coating, adhesive, solvent, or cleaner during any calendar month:

- 350 gallons of Z Guard 1021FRX
- 250 gallons each of Sherwin Williams Black Paint (Kem 400) or Asphalt Co. 9900 Paint
- 100 gallons of LaVanture Products Adhesive White/Black
- 65 gallons of Henkel Quad Sealant Advanced Grey/Black
- 50 gallons each of Henkel Quad Sealant Clear, Henkel Quad Sealant White, Walmart Black Spray, Rust-Oleum Silver Spray, Sherwin Williams Touch-Up Paint, Henkel Almond (LOS PSS 10.00Z ACWS ALM 12CC), Hi-Tech Industries Silicone (Project 1), Sherwin Williams Xylene, Sherwin Williams Mineral Spirits, Asphalt Co. 9970 Primer, or Hi-Lite Solutions AeroGreen Paint Prep
- 40 gallons of Columbia Interior Wall Paint/Floor Paint
- 10 gallons of Sherwin Williams acetone or Columbia Gray Primer

An equivalent paint, coating, adhesive, solvent, or cleaner may be used. Equivalent is defined as a material having a HAP, TAP, VOC content in pounds per gallon (lb/gal) which is equal to or less than the HAP, TAP, VOC content of the materials listed in this permit condition.

### **3.7 Spray Gun and Filter System**

- 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 98.65% within the painting operations paint booth and 96% within the undercoating booth as documented by the filter manufacturer.
- All painting inside the painting operations paint booth shall be conducted with a HVLP spray gun, or equivalent technology, with a minimum 65% transfer efficiency as documented by the spray gun manufacturer.

## **Monitoring and Recordkeeping Requirements**

### **3.8 Material Purchase Records and Safety Data Sheets**

The permittee shall monitor and record the following information to demonstrate compliance with the emissions rate limits and operating requirements:

- Trade name and identification number, or similar, of each compound used
- Safety Data Sheets (SDS) for each compound used
- Number of each compound used
- The amount, expressed as the gallons purchased and received at the facility, of each compound used
- The calculated VOC and PM<sub>10</sub> emissions using the equations provided monthly and annually.

### **3.9 Coating Material Usage Recordkeeping**

The permittee shall collect and maintain records of the following information to demonstrate compliance with the material usage permit condition.

- On a monthly basis, the material usage rate of paint, coating, adhesive, solvent, or cleaner materials in gallons per calendar month.

### **3.10 Recordkeeping**

The permittee shall comply with the recordkeeping General Provision requirements.

## **40 CFR 63, Subpart HHHHHH Requirements**

### **3.11 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, General Compliance Requirements**

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

- The permittee shall meet the requirements of 40 CFR 63.11173(e)(1). All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in 40 CFR 63.11173(f). The

spray application of surface coatings is prohibited by persons who are not certified as having completed the training described in 40 CFR 63.11173(f).

- All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of 40 CFR 63.11173(e)(2).
  - All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98% capture of paint overspray. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1.
  - Spray booths and preparation stations used to refinish complete motor vehicles or mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure.
  - Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth. The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.
- All spray-applied coatings must be applied with a high volume, low pressure (HVLP) spray gun, electrostatic application, airless spray gun, or air-assisted airless spray gun, in accordance with 40 CFR 63.11173(e)(3).
- All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent, in accordance with 40 CFR 63.11173(e)(4). Spray gun cleaning may be done by using a fully enclosed spray gun washer.
- Each owner or operator must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, are trained in the proper application of surface coatings as required by 40 CFR 63.11173(e)(1), in accordance with 40 CFR 63.11173(f). The training program must include, at a minimum:
  - A list of all current personnel by name and job description who are required to be trained;
  - Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the following topics:

Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate;

Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke;

Routine spray booth and filter maintenance, including filter selection and installation; and

Environmental compliance with the requirements of 40 CFR 63, Subpart HHHHHH.

- A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required are not required to provide the initial training to these painters.
- All new and existing personnel at the facility, including contract personnel, who spray apply surface coatings, as defined in 40 CFR 63.11180, must be trained by the dates specified in 40 CFR 63.11173(g). Employees who transfer within a company to a position as a painter are subject to the same requirements as a new hire.
  - All personnel must be trained and certified no later than 180 days after hiring or no later than January 10, 2011, whichever is later. Painter training that was completed within five years prior to the date training is required, and that meets the requirements specified in 40 CFR 63.11173(f)(2) of this section satisfies this requirement and is valid for a period not to exceed five years after the date the training is completed.
  - Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.
- The parts of the General Provisions which apply to the permittee are specified in Table 4, in accordance with 40 CFR 63.11174(a).

**3.12** 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Recordkeeping

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

- The permittee shall keep the following records in accordance with 40 CFR 63.11177(a) through (d) and (h).
  - Certification that each painter has completed the training specified in 40 CFR 63.11173(f) with the date the initial training and the most recent refresher training was completed.

- Documentation of the filter efficiency of any spray booth exhaust filter material, according to the procedure in 40 CFR 63.11173(e)(2).
- Copies of any notification submitted as required by 40 CFR 63.11175 and copies of any report submitted as required by 40 CFR 63.11176.
- Records of any deviation from the requirements in 40 CFR 63.11173, 63.11174, 63.11175, or 63.11176. These records must include the date and time period of the deviation, and a description of the nature of the deviation and the actions taken to correct the deviation.
- Records of any assessments of source compliance performed in support of the initial notification, notification of compliance status, or annual notification of changes report.
- The permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record in accordance with 40 CFR 63.11178(a). Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.
- In accordance with 40 CFR 63.11178(a), the permittee shall maintain copies of the records specified in 40 CFR 63.11177 for a period of at least five years after the date of each record. Copies of records must be kept on site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after their date, and may be kept off-site after that two year period.

**3.13** 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Notifications

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

- *Initial Notification.* The permittee must submit the initial notification required by 40 CFR 63.9(b) in accordance with 40 CFR 63.11175(a). For this existing source, the permittee must submit the Initial Notification no later than January 11, 2010. The initial notification must provide the following information.
  - The company name, if applicable;
  - The name, title, street address, telephone number, e-mail address (if available), and signature of the owner and operator, or other certifying company official;
  - The street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
  - An identification of the relevant standard, such as 40 CFR part 63, Subpart HHHHHH;

- A brief description of the type of operation. For all surface coating operations, indicate whether the source is a motor vehicle and mobile equipment surface coating operation or a miscellaneous surface coating operation, and include the number of spray booths and preparation stations, and the number of painters usually employed at the operation.
- A statement of whether the source is already in compliance with each of the relevant requirements of this subpart, or whether the source will be brought into compliance by the compliance date.
- The permittee must certify in the initial notification whether the source is in compliance with each of the requirements of 40 CFR 63, Subpart HHHHHH. If the permittee is certifying in the initial notification that the source is in compliance with the relevant requirements of this subpart, then include also a statement by a responsible official with that official's name, title, phone number, e-mail address (if available) and signature, certifying the truth, accuracy, and completeness of the notification, a statement that the source has complied with all the relevant standards of this subpart, and that this initial notification also serves as the notification of compliance status.
- *Notification of Compliance Status.* The permittee is not required to submit a separate notification of compliance status in addition to the initial notification provided the permittee was able to certify compliance on the date of the initial notification as part of the initial notification, and the permittee's compliance status has not since changed in accordance with 40 CFR 63.11175(b). The permittee must submit a Notification of Compliance Status by March 11, 2011. The permittee is required to submit the following information with the Notification of Compliance Status:
  - The company's name and the street address (physical location) of the affected source and the street address where compliance records are maintained, if different.
  - The name, title, address, telephone, e-mail address (if available) and signature of the owner and operator, or other certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance. For surface coating operations, the relevant requirements are specified in 40 CFR 63.11173(e) through (g).
  - The date of the Notification of Compliance Status.

**3.14** 40 CFR 63, Subpart HHHHHH – MACT Standards and Management Practices for Paint Stripping and Miscellaneous Surface Coating Operations, Reports

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

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

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

And,

Air Quality Permit Compliance  
Boise Regional Office  
Department of Environmental Quality  
1445 N. Orchard St.  
Boise, ID 83706  
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## 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]