



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON, BOISE, ID 83706 • (208) 373-0502

C. L. "BUTCH" OTTER, GOVERNOR
JOHN H. TIPPETS, DIRECTOR

February 1, 2017

VIA EMAIL

Tom Hogan, Facility Permitting Contact
Western Trailer Co.
P.O. 5598
Boise, ID 83705-0598

RE: Facility ID No. 001-00337, Western Trailer Co., Boise
Proposed New Permit to Construct for Public Comment

Dear Mr. Hogan,

The Department of Environmental Quality (DEQ) has prepared a proposed Permit to Construct No.P-2016.0058 for Western Trailer for the Initial PTC for an existing trailer manufacturing operation located at Boise. A public comment period has been requested, and DEQ is scheduling a 30-day public comment period in accordance with IDAPA 58.01.01.209.01.c. Rules for the Control of Air Pollution in Idaho. To find the exact dates and all other information concerning this public comment period please go to our website: <http://www.deq.idaho.gov>.

Enclosed is proposed PTC No. P-2016.0058 for your review. You may submit comments during the public comment period if you so choose. Please email them to Name AQ Public Comment@deq.idaho.gov or directly to me at tom.burnham@deq.idaho.gov.

If you have any questions regarding the terms or conditions of the proposed permit, or about the public comment period, please contact me at (208) 373-0502 or tom.burnham@deq.idaho.gov.

Sincerely,

Tom

Tom Burnham
Permit Writer
Air Quality Division

Permit No. P-2016.0058 PROJ 61796

Air Quality

PERMIT TO CONSTRUCT

Permittee Western Trailer Co.
Permit Number P-2016.0058
Project ID 61796
Facility ID 001-00337
Facility Location 6701 Business Way/P. O. 5598
Boise, ID, 83716

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 Choose DRAFT or month Choose day, Choose year

Tom Burnham, Permit Writer

Mike Simon, Stationary Source Manager

Contents

1	Permit Scope.....	3
2	Combustion Sources	6
3	Abrasive Blasting.....	7
4	Assembly Operations.....	8
5	Coating Application.....	10
6	General Provisions.....	19

1 Permit Scope

Purpose

1.1 This is the initial permit to construct (PTC) a for an existing trailer manufacturing facility.

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	MAU1 Paint Shop dry heater Manufacturer: Reznor Model: RDF2-120 Heat input rate: 1.5 MMBTU/hr Allowable fuel type: natural gas Manufactured: 2002	None
2	MAU2 Paint Shop wash bay heater Manufacturer: Reznor Model: RDF2-120 Heat input rate: 1.5 MMBTU/hr Allowable fuel type: natural gas Manufactured: 2002	None
2	MAU3 Paint booth heaters Manufacturer: Viking Model: ANS Z83.4 (2) Heat input rate: 5.6 MMBTU/hr total Allowable fuel type: natural gas Manufactured: 1998	None
2	H1 Building 1 space heater Manufacturer: Reznor Model: FT-30 Heat input rate: 0.03 MMBTU/hr Allowable fuel type: natural gas Manufactured: 1998	None
2	H2 Building 1 unit heaters Manufacturer: RE-VERBER-RAY Model: DR100 (50) Heat input rate: 5.0 MMBTU/hr total Allowable fuel type: natural gas Manufactured: 1998	None
2	H3 Building 1 tool room furnace Manufacturer: Bryant Model: Indirect-fired Heat input rate: 0.046 MMBTU/hr Allowable fuel type: natural gas Manufactured: 1998	None

2	H4 Building 1 office furnaces Manufacturer: Bryant Model: Indirect-fired (5) Heat input rate: 0.575 MMBTU/hr total Allowable fuel type: natural gas Manufactured: 1998	None
2	H5 Building 8 unit heaters Manufacturer: Reznor Model: FE250-H Direct-fired (2) Heat input rate: 0.42 MMBTU/hr total Allowable fuel type: natural gas Manufactured: 2001	None
2	H6 Building 8 training room furnace Manufacturer: Trane Model: TUE100A948K2 Heat input rate: 0.10 MMBTU/hr Allowable fuel type: natural gas Manufactured: 1999	None
2	H7 Building 10 welding area unit heaters Manufacturer: RE-VERBER-RAY Model: DR100 (8) Heat input rate: 0.80 MMBTU/hr total Allowable fuel type: natural gas Manufactured: 1998	None
2	H8 Building 10 machine shop area unit heaters Manufacturer: Modine Model: PDP125AED130 (3) Heat input rate: 0.375 MMBTU/hr total Allowable fuel type: natural gas Manufactured: 2005	None
2	H9 Building 10 office furnaces Manufacturer: Bryant Model: Plus 90 (2) Heat input rate: 0.12 MMBTU/hr total Allowable fuel type: natural gas Manufactured: 2005	None
2	H10 Blast Building heaters Manufacturer: Reznor Model: UDAS-300 (2) Heat input rate: 0.60 MMBTU/hr total Allowable fuel type: natural gas Manufactured: 1998	None
3	MB1 Media Blast Manufacturer: CLEMCO Model: 3661 Max. capacity: 10 ft ³ Manufactured: 1998	F1 Filter Manufacturer: CAMFILL FARR Model: GS-20 Filter efficiency: 99.7%

4	Welders (84) Manufacturers: Lincoln, Miller, Hypermax Types: Mig/Tig, GMAW, SAW, plasma Manufactured: 1998-2014	None
4	R1 Multicam router Manufacturer: Multicam Model: 5500 Manufactured: 1998	T1 Cyclone bag dust collector Manufacturer: Donaldson Torit Model: GS20-5 Filter efficiency: 99.9%
4	R2 Komo router Manufacturer: Komo Model: M2 512S SHO Manufactured: 1998	T2 Cyclone bag dust collector Manufacturer: Donaldson Torit Model: GS20-5 Filter efficiency: 99.9%
4	S1 Aluminum saw Manufacturer: SOCO Model: M2MC-260N/FA Manufactured: 1998	T3 Cyclone bag dust collector Manufacturer: Donaldson Torit Model: GS20-5 Filter efficiency: 99.9%
4	D1 Deburring Machines(2) Manufacturer: COSTA Model: MD4CVC1150 Max. capacity: approx.. 10,000 lb/day Manufactured: 2015/2016	T4 Downflow II Manufacturer: Donaldson Torit Model: DFT 3-18 Filter efficiency: 95%
5	Paint Booth Type: Side draft Manufactured: 1998	Spray Guns: Graco G-40 air assisted airless HVLP Transfer efficiency: 85% Graco Pro XP 85 electrostatic Transfer efficiency: 85% Filter: UltraII/Ultra Filter Efficiency: 99.90% combined
5	SR1 Solvent Recycling Manufacturer: Becca Model: 9725 6 gallon usable capacity Manufactured: 1998	None

2 Combustion Sources

2.1 Process Description

There are 13 natural gas-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
MAU1 Paint dry	None	Paint R1
MAU2 Paint wash	None	Paint R2
MAU3 Paint Booth	None	Paint V1-6
Building 1 Space Heater (H1)	None	BLD1D6
Building 1 Infrared Heaters (H2)	None	BLD1 window and doors
Building 1 Tool Room Furnace (H3)	None	BLD1 D7
Building 1 Office Furnaces (H4)	None	BLD1 D8-D12
Building 8 Unit Heaters (H5)	None	BLD8 D2-D3
Building 8 Training Room Furnace (H6)	None	BLD8 D4
Building 10 Infrared Unit Heaters (H7)	None	BLD10 doors and vents
Building 10 Machine Shop Unit Heaters (H8)	None	BLD10 D2-D4
Building 10 Office Furnaces (H9)	None	BLD10 D5-D6
Building Blast Heaters (H10)	None	BLST1-2

2.3 Opacity Limit

Emissions from the MAU1-3 and H1-10, 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 natural gas used by the facility shall not exceed 75.189 million standard cubic feet per year (MMscf/yr). The make-up air units (MAU1 and MAU2), paint booth heater (MAU3), and building heaters (H1 through H10) 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) and for the previous 12 calendar months (scf/yr) to demonstrate compliance with the Fuel Usage limit.

3 Abrasive Blasting

3.1 Process Description

Abrasive Blasting is performed to prepare surfaces for coating in an enclosed Blast Building. The process uses a 10-cubic foot blast machine, initially charged with 40,000 lbs. of Amasteel abrasive.

3.2 Control Device Descriptions

Table 3.1 Abrasive Blasting Buildings Description

Emissions Units / Processes	Control Devices	Emission Points
CLEMCO Media Blast - MB1	FARR Baghouse 99.7% filter efficiency	F1 exhaust

Emission Limits

3.3 Emission Limits

The PM or PM₁₀ emissions from the MB1 stack shall not exceed 0.2773 tons per year (T/yr) as determined by a rolling 12-month period.

3.4 Opacity Limit

Emissions from the MB1 stack, 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

3.5 Abrasive Blasting Media Usage

Annual spraying of abrasive blasting media shall not exceed 4160 hours spraying, as determined by a rolling 12-month period, of Amasteel Abrasive or equivalent media with equal or lesser amount of individual TAP or HAP pollutants.

3.6 Abrasive Blasting Media Monitoring

Each calendar month, the permittee shall monitor and record the spray gun hours of abrasive media blasting performed by the facility for the month to demonstrate compliance with the Abrasive Blasting Media Usage limit.

3.7 Abrasive Blasting Cartridge Filter Control Requirements

The permittee shall operate a cartridge filter to control PM and PM₁₀ emissions from the MB1.

3.8 O&M Manual

The permittee shall have developed an Operation and Maintenance (O&M) Manual for the cartridge filter. 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.

4 Assembly Operations

4.1 Process Description

Welding is performed at various stations in Building 1. Welding is primarily Gas Metal Arc Welding (GMAW) and Submerged Arc Welding (SAW) with carbon steel wire, concentrated in the southeast quadrant of the Building. Smaller amounts of mig/tig welding using aluminum welding wire is performed at the west side of the Building. GMAW and mig/tig welding using aluminum wire is performed at Building 8. GMAW welding with carbon steel wire and stainless steel wire is performed at Building 10. There are approximately 85 welders.

Metal cutting is performed on automated routers at Building 1 and a saw at Building 10, primarily on aluminum. Operations are dry and emissions are controlled by a Torit Cyclone 20-5 with filter bags. Metal cutting at Building 1 is performed on two automated router machines, a MultiCam and a Komo. The MultiCam discharges emissions to a Torit located outside the Building. The Komo discharges emissions to a Torit 20-5 located inside the Building. Metal cutting at Building 10 is performed on a saw manufactured by SOCO. The saw discharges emissions to a Torit 20-5 located outside the Building.

Surface burrs and edge imperfections are removed from steel using two Costa MD4CVC1150 machines. Operations are dry and emissions are controlled by a Donaldson Torritt Downflow II DFT 3-18 filter unit located outside the building.

4.2 Control Device Descriptions

Table 4.1 Assembly Operations Description

Emissions Units / Processes	Control Devices	Emission Points
Welding	None	Building 1, 8, and 10 vents
Routing	Cyclone bag dust collector	T2 exhaust
Aluminum sawing	Cyclone bag dust collector	T3 exhaust
Deburring	Filter Donaldson Torritt Downflow II Filter efficiency: 95%	T4 exhaust

Emission Limits

4.3 Opacity Limit

Emissions from each of the Building 1 vents, Torit 20-5, or DFT 3-18 stack, or any other stack, vent, or functionally equivalent opening associated with the assembly operations, 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

4.4 Welding Material Usage Limit

The maximum amount of the welding electrode materials used shall not exceed the following types and amounts or equivalent per rolling 12-month period:

Table 4.2 Welding Rod Limits By Type

Type	Usage lbs/year
Steel	90,627
Stainless Steel	14.48
Aluminum	9802

Alternate equivalent welding electrode materials may be used if it is demonstrated that the types and amounts of alternate welding electrode materials result in emissions equal or lower than the emission screening levels for toxic air pollutants (TAP) provided in IDAPA 58.01.01.585-586.

4.5 Dust Collector Operation

The permittee shall operate a dust collector to control emissions from the routers R1 and R2, the aluminum saw S1, and deburring in accordance with the O&M manual.

Monitoring and Recordkeeping Requirements

4.6 Welding Rod Usage Monitoring

Welding rod usage specified in the Welding Material Usage Limit condition shall be monitored monthly to comply with rolling 12 calendar month period pounds per year limit for each type of welding rod used.

4.7 Filter Inspection

Filters for the filtration system for the routers and aluminum saw shall be checked and replaced as outlined in the O&M Manual's specifications. Documentation of the filter replacement shall remain on site at all times and shall be made available to DEQ representatives upon request.

4.8 O&M Manual

The permittee shall have developed an Operation and Maintenance (O&M) Manual for the cyclone bag dust collector. 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.

5 Coating Application

5.1 Process Description

Paint is sprayed on metal in a totally enclosed spray booth inside the east-side of the Paint Booth Building. Approximately seven truck trailers are painted each operating day. The booth is a side-draft style with 6 exhaust fans and 2 banks of exhaust filters. Clean air is drawn in through ATI 600 filters in the top of the booth and exhausted out the filters at the Ultra II/ Ultra filters at the sides of the booth. A wash room occupies the west-side of the Paint Booth Building. A drying room occupies the remainder of the east-side of the Paint Booth Building. The heat for drying is provided by electrically powered infra-red heaters.

Used Dupont 105 cleaning solvent is recycled in a 6-gallon Becca Model 9725 solvent distillation unit located in the Paint Storage Building. Approximately, 5-10 gallons of used solvent is generated and recycled each day. The unit is generally operated once per day and yields approximate 95% of useable solvent.

5.2 Control Device Descriptions

Table 5.1 Paint Booth Description

Emissions Units / Processes	Control Devices	Emission Points
Paint Booth	Spray Guns: Graco G-40 air assisted airless HVLP Transfer efficiency: 85% Graco Pro XP 85 electrostatic Transfer efficiency: 85% Filter: UltraII/ Ultra Filter Efficiency: 99.90% combined	Paint V1-6
Solvent Recycling	None	Paint Storage BLD vents

Emission Limits

5.3 Emission Limits

The emissions from the Paint booth stacks shall not exceed any corresponding emissions rate limits listed in Table 5.2.

Table 5.2 Paint Booth Emission Limits

Source Description	PM ₁₀ ^(b)		VOC	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Paint Booth	0.007	0.018	11.64	29.04

- 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 Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.

5.4 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.

5.5 Opacity Limit

Emissions from the paint booth stacks, or any other stack, vent, or functionally equivalent opening associated with the PB1 and PB2, 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

5.6 Coating Material Usage Limits

The maximum amount of all coating materials used at the facility shall not exceed 17,494.9 gallons per rolling 12-calendar month period (gal/yr).

5.7 Coating Material Formulations

The permittee shall use only the HAP-, TAP-, and VOC-containing coating materials listed in Table 5.3 as raw materials. Any changes in coating material formulations at the facility may require a permit to construct (or permit revision) in accordance with IDAPA 58.01.01.201 unless the usage of alternate coating material formulations is demonstrated to result in emissions lower than the Paint Booth Emission Limits (Table 5.2), and result in emissions lower than all emission screening levels for toxic air pollutants (TAP) provided in IDAPA 58.01.01.585-586.

Table 5.3 Coating Materials

Manufacturer	Coating Material Description
Akzo Nobel	LV260 Primer
Akzo Nobel	LV260 Epoxy Primer Hardener Fast
Akzo Nobel	Reducer LV260-Slow
Akzo Nobel	SRA Strong Reducer
Akzo Nobel	UTE Tint Composite
Akzo Nobel	UTE 350 Binder
Akzo Nobel	UTE 99 Reducer
Akzo Nobel	UTE 280/350 Hardener
Akzo Nobel	998 Accelerator
Akzo Nobel	UTE 350 RM 99U Black
Akzo Nobel	UTE 280/350 Hardener-Topcoat
Akzo Nobel	UTE R200 Reducer

5.8 Spray Gun and Filter Operation

- The permittee shall install, maintain, and operate each filter system in accordance with manufacturer's specifications. The corresponding filter system shall be operated at all times when the paint spray booth is operating. Any period of time that the paint spray booth is in operation while the corresponding filter system is not in operation shall be treated as an excess emission event, and the permittee shall comply with excess emission procedures and requirements included in the General Provisions of this permit. All coating activities at this facility shall be conducted inside a paint spray booth with filter system in place and exhaust fans operating.

- All painting shall be conducted with air-assisted airless, airless, HVLP, or equivalent technology, with a minimum 75% 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 99.9% for particulate emissions as documented by the filter manufacturer.

5.9 O&M Manual

The permittee shall have developed an Operation and Maintenance (O&M) Manual for the paint booth filtration and solvent recovery systems. 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.

Monitoring and Recordkeeping Requirements

5.10 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.

5.11 Paint Spray Booth Emissions Monitoring

The permittee shall maintain records onsite demonstrating that emissions from coating operations do not exceed limits in Table 5.2 and do not exceed all emission screening levels in IDAPA 58.01.01.585–586 (Sections 585 and 586). Emissions shall be evaluated on a pollutant-by-pollutant basis.

- Each week that coatings are used, the permittee shall monitor and record the amount of each coating material used in all paint spray booths in gallons per week (gal/week).
- Each calendar month, the permittee shall monitor and record the amount of each coating material used in all paint spray booths for the previous month in gallons per month (gal/mo) and for the previous 12 calendar months (gal/yr).
- Each week, the permittee shall monitor and record emissions from all paint spray booths of each Section 585 TAP emitted in average pounds per hour over the 168-hour weekly averaging period (lb/hr). Each average emission rate (lb/hr) shall be compared to the relevant screening emission level (EL) to determine compliance with Section 585 TAP Paint Spray Booth Emission Limits. For emissions in excess of TAP EL, the permittee shall comply with excess emission procedures and requirements included in the General Provisions of this permit.
- Each calendar month, the permittee shall monitor and record emissions from all paint spray booths of each Section 586 TAP emitted in pounds per month for the previous month (lb/mo), in pounds per year for the previous rolling 12 calendar month period (lb/yr), and in average pounds per hour over the 12 calendar month averaging period (lb/hr). Each average emission

rate (lb/hr) shall be compared to the relevant EL to determine compliance with Section 586 TAP Paint Spray Booth Emission Limits. For emissions in excess of TAP EL, the permittee shall comply with excess emission procedures and requirements included in the General Provisions of this permit.

- Each calendar month, the permittee shall monitor and record emissions from all paint spray booths of VOC, and PM10 emitted in tons per month for the previous month (T/mo), and tons per year for the previous 12 calendar month period (T/yr) to demonstrate compliance with VOC, and PM10 Paint Spray Booth Emission Limits.
- Documentation such as manufacturer's specification sheets that supports filter efficiencies, transfer efficiencies, capture efficiencies, and other engineering assumptions relied upon in emission calculations shall be maintained onsite.

5.12 Material Purchase Records and Safety Data Sheets

For each material used at the facility, including but not limited to pre-treatment wash primer, primer, topcoat, clear coat, catalyst, activator, hardener, and thinner/reducer, the permittee shall record and maintain the following records:

- Material purchase volume records
- Safety Data Sheets (SDS)

5.13 Filter Inspection

Filters for the filtration system for the paint booth shall be checked and replaced as outlined in the O&M Manual's specifications. Documentation of the filter replacement shall remain on site at all times and shall be made available to DEQ representatives upon request.

40 CFR 63, Subpart HHHHHH Requirements

5.14 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) 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.

5.15 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 the EPA has been granted to this facility in accordance with 40 CFR 63.11170 (a)(2), the parts of the General Provisions which apply to the permittee are specified in Table 5.4, in accordance with 40 CFR 63.11174(a).

Table 5.4 Applicability of General Provisions to Subpart HHHHHH of Part 63

Citation	Subject	Explanation
40 CFR 63.1(a)(1)-(12)	General Applicability	
40 CFR 63.1(b)(1)-(3)	Initial Applicability Determination	Applicability of subpart HHHHHH is also specified in 40 CFR 63.11170.
40 CFR 63.1(c)(1)	Applicability After Standard Established	
40 CFR 63.1(c)(2)	Applicability of Permit Program for Area Sources	
40 CFR 63.1(c)(5)	Notifications	
40 CFR 63.2	Definitions	Additional definitions are specified in 40 CFR 63.11180.
40 CFR 63.3(a)–(c)	Units and Abbreviations	
40 CFR 63.4(a)(1)–(5)	Prohibited Activities	
40 CFR 63.4(b)–(c)	Circumvention/Fragmentation	
40 CFR 63.6(a)	Compliance With Standards and Maintenance Requirements—Applicability	
40 CFR 63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	40 CFR 63.11172 specifies the compliance dates.
40 CFR 63.6(c)(1)-(5)	Compliance Dates for Existing Sources	40 CFR 63.11172 specifies the compliance dates.
40 CFR 63.6(e)(1)-(2)	Operation and Maintenance	
40 CFR 63.6(f)(1)	Compliance Except During Startup, Shutdown, and 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	

5.16 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 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) through (d) and (h), and (e) through (g) 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)(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.

5.17 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 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,

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

5.18 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.

6 General Provisions

General Compliance

6.1 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.]

6.2 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]

6.3 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

6.4 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

6.5 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]

6.6 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

6.7 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.

6.8 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.

6.9 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

6.10 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

- 6.11** 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

- 6.12** 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

- 6.13** 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

- 6.14** 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

- 6.15** 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

- 6.16** 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]