

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** Rule Steel  
**Permit Number** P-2017.0055  
**Project ID** 61952  
**Facility ID** 027-00156  
**Facility Location** 11299 Bass Lane  
Caldwell, Idaho 83605

### Permit Authority

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

**Date Issued** DRAFT XX, 2018

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**Rakael Pope, Permit Writer**

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# 1 Permit Scope

## Purpose

1.1 This is an initial permit to construct (PTC) to permit an existing steel fabrication and 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	<u>Plasma Cutter #1:</u> Manufacturer: Hypertherm Model: HPR400XD Handheld/Table: Table Manufacture Date: 2017	<u>Water Table:</u> Manufacturer: Hypertherm Model: HPR400XD Type: Water Table Dry/Semidry/Wet: Wet PM <sub>10</sub> control efficiency: 99.0%  <u>Air Filtering System:</u> Manufacturer: AZTech Model: T6000-S Prefilter: 4" Pleated, MERV-11 Filter: Bag Filter, MERV-15 PM <sub>10</sub> control efficiency: 99.0%
	<u>Plasma Cutter #2:</u> Manufacturer: Hypertherm Model: HPR400XD Handheld/Table: Table Manufacture Date: 2017	<u>Water Table:</u> Manufacturer: Hypertherm Model: HPR400XD Type: Water table Dry/Semidry/Wet: Wet PM <sub>10</sub> control efficiency: 99.0%  <u>Air Filtering System:</u> Manufacturer: AZTech Model: T6000-S Prefilter: 4" Pleated, MERV-11 Filter: Bag Filter, MERV-15 PM <sub>10</sub> control efficiency: 99.0%
3	<u>Welders:</u> Manufacturer: Miller, Lincoln, Hobart, Thermal Arc, Linde, Syncrowave, Pro Weld Weld Type: GMAW, FCAW, SMAW	Fully enclosed building with closed doors
4	<u>Abrasive Blasting:</u> Manufacturer: Clemco Model: 2020 Hopper Capacity: 4ft <sup>3</sup>	None

Permit Section	Source	Control Equipment
5	<p><u>H60 Spray Guns or HVLP equivalent<sup>(a)</sup> spray gun:</u>  Manufacturer: Graco  Model: Pro XP H60T10  Transfer Efficiency: 60%  Rated Capacity: 11.00 gal/hr</p> <p><u>H85 Spray Guns or HVLP equivalent<sup>(a)</sup> spray gun:</u>  Manufacturer: Graco  Model: Pro XP H85T10  Transfer Efficiency: 85%  Rated Capacity: 11.25 gal/hr</p>	<p><u>Paint Booth 1:</u>  Manufacturer: Global Finishing Solutions  Model: CDG-2421PDT-100-BB-S  Type: Pressurized Crossdraft  Filter Manufacturer: Paint Pockets or equivalent<sup>(a)</sup>  Filter Model: PP Series  Filter Type: Dry filter panel  PM<sub>10</sub> control efficiency: 99.84%</p> <p><u>Paint Booth 2:</u>  Manufacturer: Global Finishing Solutions  Model: CDF-1614PDT-120-BB-S  Type: Pressurized Crossdraft  Filter Manufacturer: Paint Pockets or equivalent<sup>(a)</sup>  Filter Model: PP Series  Filter Type: Dry filter panel  PM<sub>10</sub> control efficiency: 99.84%</p>
GP	<p><u>Heaters:</u>  Manufacturer: Original Mr. Heater  Model: Contractor Series  Total heat input rating: 1.5 MMBtu/hr  Fuel: Propane (LPG)  Number of Units: 9</p> <p><u>Grinders<sup>(b)</sup>:</u>  Manufacturer: DeWalt, Makita, or equivalent  Type: Handheld  Wheel size: 5" through 9"</p>	None

- (a) Paint Booth filter and HVLP spray gun “equivalent” sources and control equipment shall not result in an emission increase or in the emission of any regulated air pollutant not previously emitted (using the definitions provided in IDAPA 58.01.01.006) when compared to the sources and control equipment listed in this table.
- (b) Hand grinders are portable units and do not include bench grinders or belt sanders

## 2 Plasma Cutting Operations

### 2.1 Process Description

Rule Steel performs wet plasma cutting operations only, using table mounted plasma cutters which process steel and stainless steel in submerged water baths located in a building with a ceiling mounted, recirculating filtration system that completes a full-volume plasma cutting shop air change rate of eight minutes.

### 2.2 Control Device Descriptions

**Table 2.1 Plasma Cutting Operation Description**

Emissions Units / Processes	Control Devices	Emission Points
Plasma Cutter #1	- Water bath - Air Filtering System	Plasma cutting shop doors 1-8
Plasma Cutter #2	- Water bath - Air Filtering System	Plasma cutting shop doors 1-8

## Emission Limits

### 2.3 Emission Limits

The emissions from the plasma cutting operations shall not exceed any corresponding emissions rate limits listed in the following table.

**Table 2.2 Plasma Cutting Operation Emission Limits <sup>(a)</sup>**

Source Description	PM <sub>10</sub> <sup>(b)</sup>		NO <sub>x</sub>	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
Plasma Cutters #1 and #2 (total)	0.014	0.015	1.09	3.34

- 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.

### 2.4 Opacity Limit

Emissions from the plasma cutting operations building stack, or any other stack, vent, or functionally equivalent opening associated with the plasma cutting 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

### 2.5 Annual Plasma Cutting Throughput Limits

The plasma cutting operation shall not exceed 6,100 hours per year (hr/yr) for each cutter as determined on a rolling, 12-month basis by calculating the hours of cutting each month and adding the hours of plasma cutting for the previous eleven months.

### 2.6 Material Restriction

Plasma cutting operations shall be conducted only to process carbon steel and stainless steel. The permittee shall monitor and record carbon steel and stainless steel usage to ensure stainless steel usage does not exceed 5% by weight of all metal cut as determined on a rolling, 12-month basis.

## **2.7 Plasma Cutting Table Operation**

Only wet plasma cutting shall be conducted at this facility. The water level must be maintained where the burner is submerged at a minimum of 70 millimeters (mm) below the water surface.

## **2.8 Filtration System**

Within 60 days of the permit issuance or by a DEQ-approved alternate date, the permittee shall install, maintain, and operate, according to the manufacturer's specifications and recommendations, a filtration system to maintain a minimum control efficiency of 95% for PM<sub>10</sub> as documented by the filter manufacturer. Plasma cutting operations at this facility shall only be conducted with use of this functioning filtration system.

## **2.9 O&M Manual**

Within 60 days of initial start-up the permittee shall have developed a Filtration System Operation and Maintenance (O&M) Manual that must include inspection and operation of the filter system including filter inspection and replacement criteria. 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 operate as efficient 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**

### **2.10 Throughput Monitoring**

Each calendar month, the permittee shall monitor and record the operating hours of each plasma cutter for the previous month in hours per month (hr/mo) and for the previous twelve calendar months in hours per year (hr/yr) to demonstrate compliance with permitted limits.

### **2.11 Annual Throughput Recordkeeping**

Records shall be maintained for the previous twelve calendar months (hr/yr) to demonstrate compliance with the Annual Plasma Cutting Throughput Limits and Material Restriction Permit Conditions. Supporting information includes, but is not limited to, receipts and inventory logs. Records shall be kept according to the Monitoring and Recordkeeping General Provision.

### **2.12 Filtration System Recordkeeping**

Records shall include, but not be limited to date and time of inspection, filter installation, equipment inspected and date a corrective action was taken. Supporting information includes, but is not limited to receipts and inventory logs. The operating, monitoring and recordkeeping requirements specified in the Filtration System O & M Manual are incorporated by reference to this permit and are enforceable permit conditions. Records shall be kept according to the Monitoring and Recordkeeping General Provision.

### **2.13 Filter Recordkeeping**

Records shall be maintained for the filters documenting filter control efficiency for PM<sub>10</sub> and PM<sub>2.5</sub> is 95% or greater. Supporting information includes, but is not limited to receipts and inventory logs. Records shall be kept according to the Monitoring and Recordkeeping General Provision.

### 3 Welding Operations

#### 3.1 Process Description

This facility conducts welding operations in the structural steel shop, Diamond Z shop, plasma cutting shop, container shop, handrail shop, and tank shop. Welding includes Gas Metal Arc Welding (GMAW, also referred to as Metal Inert Gas, MIG welding), Flux Cored Arc Welding (FCAW), and Shielded Metal Arc Welding (SMAW). Welding is done on carbon steel and stainless steel.

#### 3.2 Control Device Descriptions

Table 3.1 Welding Operation Description

Emissions Units / Processes	Control Devices	Emission Points
<u>Welders:</u> Gas Metal Arc Welding (GMAW) Flux Cored Arc Welding (FCAW) Shielded Metal Arc Welding (SMAW)	Fully enclosed building with closed doors	Diamond Z Shop Doors 1-15 Structural Steel Shop Doors 1-6 Plasma Cutting Shop Doors 1-8 Container Shop Doors 1-7 Handrail Shop Doors 1-3 Tank Shop Doors 1-7

### Emission Limits

#### 3.3 Emission Limits

The combined emissions from the Welding Operations occurring in all shops shall not exceed any corresponding emissions rate limits listed in the following table.

Table 3.2 Welding Operations Emission Limits <sup>(a)</sup>

Source Description	PM <sub>10</sub> <sup>(b)</sup>	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
Welding Operation	0.10	0.45

- 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.

#### 3.4 Opacity Limit

Emissions from the welding operations buildings or structure stacks, or any other stack, vent, or functionally equivalent opening associated with the welding 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

#### 3.5 Closed Door Requirement

Doors and windows, vents, stacks, or other openings of buildings at this facility where welding operations are conducted must be kept closed during welding activities, except for personnel entering or exiting the building, and may not be propped open or otherwise remain open during operation of welders.

### 3.6 Annual Welding Throughput Limits

Welding operations at this facility are limited to Gas Metal Arc Welding (GMAW, also referred to as Metal Inert Gas, MIG welding), Flux Cored Arc Welding (FCAW), and Shielded Metal Arc Welding (SMAW). In any consecutive 12 calendar months, the permitted electrode material usages shall not exceed the annual limits in the following table.

**Table 3.3 Approved Electrode Materials and Limits**

Welding Type	Max Usage by Welding Type	Electrode Type (by AWS Classification)	Maximum Usage
	lb/year		lb/year
Gas Metal Arc Welding (GMAW)	80,601	E70S	79,340
		E308L	1,261
Flux Cored Arc Welding (FCAW)	20,115	E71T	19,778
		E308LT	337
Shielded Metal Arc Welding (SMAW)	38,649	E6011	23,335
		E7024	7,292
		E7018	4,193
		E6010	3,828

## Monitoring and Recordkeeping Requirements

### 3.7 Annual Throughput Monitoring

For each electrode type (by AWS Classification), each month, the permittee shall add the monthly rod usage to the previous 11-month rod usage to demonstrate compliance with the annual limits in the Permitted Electrode Materials and Limits table.

### 3.8 Recordkeeping

Records shall be kept according to the Monitoring and Recordkeeping General Provision. Supporting information includes, but is not limited to each welding electrode's SDS sheet, receipts and inventory logs. Records shall be kept according to the Monitoring and Recordkeeping General Provision.



## 4 Abrasive Blasting

### 4.1 Process Description

Rule Steel conducts a dry abrasive blasting operation using Kleen Blast abrasive and crushed glass abrasive media in a semi-enclosed abrasive blasting structure.

### 4.2 Control Device Descriptions

**Table 4.1 Abrasive Blasting Operation Description**

Emissions Units / Processes	Control Devices	Emission Points
Abrasive Blaster Kleen Blast and Crushed Glass Abrasives	None	Abrasive Blasting Structure Openings ABR_BLAST1 Door ABR_BLAST2 Door

## Emission Limits

### 4.3 Emission Limits

The emissions from the Abrasive Blasting Operation stack shall not exceed any corresponding emissions rate limits listed in the following table.

**Table 4.2 Abrasive Blasting Operation Emission Limits<sup>(a)</sup>**

Source Description	PM <sub>10</sub> <sup>(b)</sup>	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
Abrasive Blasting Operation	0.27	0.38

- 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.

### 4.4 Opacity Limit

Emissions from the abrasive blasting building or structure stack, or any other stack, vent, or functionally equivalent opening associated with the abrasive blasting operation, 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

### 4.5 Daily Abrasive Blasting Media Throughput Limit

The abrasive blasting media usage, including recycled abrasive media, shall not exceed 500 pounds per day.

### 4.6 Annual Abrasive Blasting Media Throughput Limit

The total abrasive blasting media throughput, including reused abrasive media, shall not exceed 58,000 pounds in any consecutive 12 calendar months.

#### **4.7 Abrasive Blasting Media Content**

Abrasive blasting media shall consist of 50% or less of Kleen Blast and 50% or more of Crushed Glass.

#### **4.8 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.

### **Monitoring and Recordkeeping Requirements**

#### **4.9 Daily Throughput Monitoring**

The permittee shall monitor and record each day abrasive blasting occurs, in pounds, the amount of blasting media, including reused abrasive blasting media, used in the abrasive blasting operation to demonstrate compliance with the daily throughput limit in the Daily Abrasive Blasting Media Throughput Limit Permit Condition.

#### **4.10 Annual Throughput Monitoring**

The permittee shall record monthly the amount of abrasive media used, including any reused abrasive media, and add it to the amount of abrasive media used, including the recycled abrasive media, in the previous 11 months to demonstrate compliance with the annual throughput limit in the Annual Abrasive Blasting Media Throughput Limit Permit Condition.

#### **4.11 Recordkeeping Requirement**

Supporting information includes, but is not limited to abrasive media SDS sheets, receipts and inventory logs. Records shall be kept according to the Monitoring and Recordkeeping General Provision.

## 5 Coating Operations

### 5.1 Process Description

Coating operations including primer application, coating applications, and drying are conducted in enclosed paint booths that are completely enclosed buildings.

### 5.2 Control Device Descriptions

**Table 5.1 Coating Operations Description**

Emissions Units / Processes	Control Devices	Emission Points
<u>H60 Spray Guns</u> Transfer Efficiency: 60%	<u>Completely Enclosed Booth with Exhaust Filters:</u> Air filtration system control efficiency: 99% or greater for PM <sub>10</sub>	<u>Paint Booth 1, Stacks 1 &amp; 2</u> PAINTSTK1 PAINTSTK2 <u>Paint Booth 2, Stacks 3 &amp; 4</u> PAINTSTK3 PAINTSTK4
<u>H85 Spray Guns</u> Transfer Efficiency: 85%	<u>Completely Enclosed Booth with Exhaust Filters:</u> Air filtration system control efficiency: 99% or greater for PM <sub>10</sub>	<u>Paint Booth 1, Stacks 1 &amp; 2</u> PAINTSTK1 PAINTSTK2 <u>Paint Booth 2, Stacks 3 &amp; 4</u> PAINTSTK3 PAINTSTK4

## Emission Limits

### 5.3 Emission Limits

The emissions from the Coating Operations stacks shall not exceed any corresponding emissions rate limits listed in the following table.

**Table 5.2 Coating Operation Emission Limits<sup>(a)</sup>**

Source Description	PM <sub>10</sub> /PM <sub>2.5</sub> <sup>(b)</sup>	VOC <sup>(c)</sup>	Individual HAP <sup>(d)</sup>	Total HAP <sup>(e)</sup>
	lb/day <sup>(f)</sup>	lb/day <sup>(f)</sup>	lb/day <sup>(f)</sup>	lb/day <sup>(f)</sup>
Coating Operation	0.18	223.36	44.02	98.87

- In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- PM including condensable PM as defined in IDAPA 58.01.01.006, with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers for PM<sub>2.5</sub>, and less than or equal to a nominal 10 micrometers for PM<sub>10</sub>.
- Volatile organic compounds (VOC).
- Emission limit for any single hazardous air pollutant (HAP).
- Emission limit for total of all HAP (combined).
- Worst-case pounds of emissions from all coating operations per calendar day (combined) as calculated using procedures in this permit to estimate these emissions, or as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference method, or DEQ-approved alternative.

### 5.4 Opacity Limit

Emissions from the Coating Operations stacks, or any other stack, vent, or functionally equivalent opening associated with the Coating 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.

## 5.5 Odor Limit

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.

## Operating Requirements

### 5.6 Annual Coating Usage Limits

The following table lists grouping of approved permitted coatings.

**Table 5.3 Coatings within Coating Groups**

Coating Group	Coating	Annual Coating Group Usage Limit (gal/yr) <sup>(b)</sup>
KEM FLASH® ULTRA-BOND® Line	KEM FLASH* ULTRA-BOND* Primer, Gray KEM FLASH* ULTRA-BOND* Primer, Black	233
KEM® 400 Line	KEM* 400 Enamel, Silver Metallic KEM* 400 Enamel, Gloss Black KEM* 400 Enamel, Gloss Black KEM* 400 Enamel, Gloss Black KEM* 400 Enamel, White Base KEM* 400 Enamel, OLYMPIA DARK GRAY KEM* 400 Enamel, YAKIMA GRAY KEM * 400 Enamel, WESTERN WASTE GRAY KEM* 400 Enamel, OLIVE GREEN KEM* 400 Enamel, CURRY GREEN KEM* 400 Enamel, IRISH SETTER TAN KEM* 400 Enamel, rodde safety blue hypertoner KEM* 400 Enamel, IP57 INDUSTRIAL BLUE KEM* 400 Enamel, CITY OF OLYMPIA RECYCLE BLUE KEM* 400 Enamel, CONTAINER BLUE F77L19 KEM* 400 Enamel, RODDA 23322 CARIBBEAN BLUE KEM* 400 Enamel, DETROIT BLUE SW6516 DOWN POUR KEM* 400 Enamel, CANYON HILL BLUE-BLUE RIBBON KEM* 400 Enamel, Latah Blue (new) KEM* 400 Enamel, LEMAY BLUE KEM* 400 Enamel, ADM BLUE KEM* 400 Enamel, SAFETY BLUE DEVOE KEM* 400 Enamel, WASTE CONNECTION BLUE KEM* 400 Enamel, BLUE CHIP - RECYCLE BLUE KEM* 400 Enamel, ALLIED BLUE KEM* 400 Enamel, INDUSTRIAL BLUE KEM* 400 Enamel, PSI TAN KEM* 400 Enamel, SW 6089 GROUNDED KEM* 400 Enamel, Latah Bronze KEM* 400 Enamel, sw6089 grounded KEM* 400 Enamel, CURRY BROWN KEM* 400 Enamel, 2015 NEW ROGUE RED KEM* 400 Enamel, COASTAL WHITE KEM* 400 Enamel, 803 CAT YELLOW KEM* 400 Enamel, CAT YELLOW	1,800
Hi-Mil SHER-TAR™ Line	Hi-Mil SHER-TAR* Coal Tar Epoxy Enamel (Part A) Hi-Mil SHER-TAR* Epoxy Enamel Hardener (Part B)	100

Coating Group	Coating	Annual Coating Group Usage Limit (gal/yr) <sup>(b)</sup>
MACROPOXY® Line	MACROPOXY* 646 Fase Cure Epoxy (Part A), Mill White MACROPOXY* 646 Fase Cure Epoxy (Part B), Hardener	100
Quick Dry Enamel Line	Quick Dry Enamel, Blue Quick Dry Enamel, Container Brown Quick Dry Enamel, LF Machinery Red Quick Dry Enamel, LF Safety Yellow Quick Dry Enamel, L.F. Packer Green Quick Dry Enamel, CONTAINER GRAY Quick Dry Enamel, S T GRAY Quick Dry Enamel, HORIZON GRAY 801 Quick Dry Enamel, DEWALT BEIGE Quick Dry Enamel, Rogue Gray Quick Dry Enamel, NEW ROGUE GRAY Quick Dry Enamel, OMAHA ORANGE Quick Dry Enamel, SAFETY ORANGE Quick Dry Enamel, CONTAINER ORANGE Quick Dry Enamel, BEJO LIGHT GREEN Quick Dry Enamel, FOREST GREEN Quick Dry Enamel, UNITED GREEN Quick Dry Enamel, JOHN DEERE GREEN Quick Dry Enamel, CEDAR GREEN SW4072 Quick Dry Enamel, OLIVER GREEN 28603 Quick Dry Enamel, BEND GARBADGE GREEN Quick Dry Enamel, OLIVER GREEN 844 F77XXG3131 Quick Dry Enamel, RODDA 7899 MILLER GREEN Quick Dry Enamel, JOHNSON GREEN IP38 MEDIUM Quick Dry Enamel, WILDERNESS GARBAGE GREEN Quick Dry Enamel, ALLIED GREEN Quick Dry Enamel, RECYCLE GREEN Quick Dry Enamel, WASTE MANAGEMENT GREEN Quick Dry Enamel, triangle green Quick Dry Enamel, PACKER BEIGE Quick Dry Enamel, SYNGENTA BEIGE Quick Dry Enamel, 808 DARK BLUE Quick Dry Enamel, MAC BLUE Quick Dry Enamel, BOSWELL LIGHT BLUE Quick Dry Enamel, Farmer Grain Blue Quick Dry Enamel, LEATHER BROWN Quick Dry Enamel, RODDA SABLE 24164 Quick Dry Enamel, RODDA 805 DARK BROWN Quick Dry Enamel, RODDA RED Quick Dry Enamel, RODDA INTL HARVESTER RED Quick Dry Enamel, RODDA 812 SAFETY RED Quick Dry Enamel, CONTAINER RED Quick Dry Enamel, INDUSTRIAL WHITE 23158 RODDA Quick Dry Enamel, WHITE Quick Dry Enamel, J.M. SANITATION GRAY	3,750
Shopcoat Primer Line	Shopcoat Primer, Gray Shopcoat Primer, Gray Shopcoat Primer, Gray Shopcoat Primer, Red Oxide Shopcoat Primer, Red Oxide	10,100
ZINC CLAD ® Line	ZINC CLAD* 5 Organic Zinc Rich Primer	5

Coating Group	Coating	Annual Coating Group Usage Limit (gal/yr) <sup>(b)</sup>
Metal Primer Line	Metal Primer, E61A705 GRAY PRIMER Metal Primer, SHOPCOAT GRAY PRIMER	180
DIRECT-TO-METAL ENAMEL Line	Direct-to-Metal Alkyd Enamel, Ultradeep Base DTM WHITE, F75WV1 WHITE DTM ENAMEL FIVE	180
Reducers Line	S9860 Fast Reducer S98760 Medium Reducer S9885 Slow Reducer	319
High Solids Activator	H7 High Solids Activator	280
Epoxy Primer	EP210MG Medium Gray Epoxy Primer	315
Epoxy Catalyst	EX355 Epoxy Catalyst	200
Jet Black	Jet Black	180
Coastal White	928W35085 Coastal White	1,037
Quick Dry Shop Primer	QUICK DRY SHOP PRIMER X.L. GREY	700
Paint Thinner/Cleaning	Xylene (Xylol)	400
<b>Annual Total<sup>(b)</sup></b>		<b>19,879</b>

a) Gallons per rolling 12-calendar month period.

b) The total per rolling 12-calendar month period of all coating materials used, including coatings, solvents, thinners, additives, and cleaning materials.

## 5.7 Approved Daily Coating Usage Scenario

Unless the permittee is complying with an Alternate Daily Coating Usage Scenario which demonstrates compliance with Coating Emission Limits and Screening Emission Rates and Modeled Concentration Limits, the permittee shall comply with the daily coating usage limits in the following table. The combined usage for any of these coatings shall not exceed 180 gallons per day.

**Table 5.4 Approved Daily Coating Usage Scenario**

Coating Group	Daily Usage Limit (gal/day) <sup>(a)</sup>
KEM FLASH® ULTRA-BOND® Line	<b>180</b>
KEM® 400 Line	
Hi-Mil SHER-TAR™ Line	
MACROPOXY® Line	
Quick Dry Enamel Line	
Shopcoat Primer Line	
Metal Primer Line	
DIRECT-TO-METAL ENAMEL Line	
Reducers Line	
High Solids Activator	
Epoxy Primer	
Epoxy Catalyst	
Jet Black	
Coastal White	
Quick Dry Shop Primer	
Paint Thinner/Cleaning	

a) Gallons per calendar day

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

## **5.8 Spray Booth Operation**

All coating activities at this facility shall be conducted inside a paint booth with a functioning filter system in place, exhaust fan(s) operating, and door(s) or curtain(s) closed. During use, the booth 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 side curtains.

## **5.9 Spray Gun Operation**

All painting shall be conducted with high-volume low-pressure (HVLV) spray guns or equivalent technology with a minimum 60% transfer efficiency as documented by the spray gun manufacturer.

## **5.10 Spray Booth Filtration 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 99% for PM<sub>10</sub> as documented by the filter manufacturer.

## **5.11 O&M Manual**

Within 60 days of initial start-up the permittee shall have developed a filter system Operation and Maintenance (O&M) Manual that must include inspection and operation of the filter system including filter replacement criteria. 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 operate as efficient 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.

## **Alternate Daily Coating Usage Scenarios**

### **5.12 Daily Coating Usage Scenario**

Unless using a Daily Coating Usage Scenario for which compliance has previously been determined in the Approved Daily Coating Usage Scenario table (such as when new or reformulated coating materials are introduced), each day before coating materials are used the permittee shall follow the procedures of this section. The permittee shall not use any new Daily Coating Usage Scenario until coating TAP compliance and Coating Emission Limit compliance have been demonstrated for that Scenario according to the procedures below.

### **5.13 Propose a Daily Coating Usage Scenario**

Prior to using or implementing a new Daily Coating Usage Scenario:

- The permittee shall propose and record maximum daily coating 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 coating usage limits.
- The permittee shall estimate emissions of PM<sub>10</sub>/PM<sub>2.5</sub>, VOC, individual HAP, total HAP, and all TAP listed in the Approved Daily Coating Usage Scenario table for the Scenario (lb/day for each pollutant), using the procedures described below for estimating emissions.
- The permittee shall demonstrate coating TAP compliance for the Scenario, using the procedures described below for demonstrating coating TAP compliance. The permittee shall not use or implement any Scenario that does not demonstrate coating TAP compliance.

- The permittee shall demonstrate Coating Emission Limit compliance for the Scenario, using the procedures described below for demonstrating Coating Emission Limit compliance. The permittee shall not use or implement any Scenario that does not demonstrate Coating Emission Limit compliance.
- The daily coating usage limits and emission estimates used in determining coating TAP compliance and Coating Emission Limit compliance shall be based on estimated emissions from all coatings to be used from all coating operations at the facility (i.e., facility-wide).

#### **5.14 Estimate Coating TAP Emissions**

TAP emissions shall be estimated for all TAP listed in the TAP Screening Emissions Rates and Modeled Concentration Limits table:

- Emissions shall be estimated by multiplying each maximum daily coating usage rate (gal/day) by the TAP content (lb/gal) of that coating, and summing the total emissions from all coating materials (lb/day). TAP emissions which are designated as a particulate in the Approved Daily Coating Usage Scenario table 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 listed as below detection on SDS or other documentation, the TAP content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.
- When the TAP content cannot be determined from SDS or other documentation, the TAP content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.

#### **5.15 Demonstrate Coating TAP Compliance**

For each Daily Coating Usage Scenario, the permittee shall estimate TAP emissions and compare against the TAP Screening Emission Rates or Modeled Concentration Limits in TAP Screening Emissions Rates and Modeled Concentration Limits table:

- The permittee shall compare estimated TAP emissions for all coatings against the Screening Emission Rates in the TAP Screening Emissions Rates and Modeled Concentration Limits table. 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 Coating Usage Scenario shall not exceed the Modeled Concentration Limits in the TAP Screening Emissions Rates and Modeled Concentration Limits table. 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 5.5 TAP Screening Emission Rates and Modeled Concentration Limits**

<b>TAP</b>	<b>CAS</b>	<b>Particulate?</b>	<b>Screening Emission Rate (lb/day)<sup>(a)</sup></b>	<b>Modeled Concentration Limit (mg/m<sup>3</sup>)</b>
Acetone	67-64-1	No	2856	89
Acrylamide	79-06-1	No	0.0001224	0.00000077
Aluminum - Metal and Oxide	7429-90-5	Yes	16.008	0.5
Aluminum - Soluble Salts	7429-90-5	Yes	3.192	0.1
n-Amyl Acetate	628-63-7	No	847.2	26.5
Antimony & Compounds, as Sb	7440-36-0	Yes	0.792	0.025
Barium (Soluble Compounds), as Ba	7440-39-3	Yes	0.792	0.025
Benzene	71-43-2	No	0.0192	1.20E-04
Benzoyl peroxide	94-36-0	No	7.992	0.25
Bis (2-Ethylhexyl) Phthalate (DEHP)	117-81-7	No	0.672	0.0042
2-Butoxyethanol	111-76-2	No	192	6
2-Butoxyethyl Acetate	112-07-2	No	199.92	1.25
n-Butyl Acetate	123-86-4	No	1135.2	35.5
n-Butyl Alcohol	71-36-3	No	240	7.5
Calcium Carbonate	1317-65-3	Yes	16.008	0.5
Carbon Black	1333-86-4	Yes	5.52	0.175
Carbon Tetrachloride	56-23-5	No	0.01056	0.067
Chromium Metal, Chromium (III) Compounds as Cr	7440-47-3, 16065-83-1	Yes	0.792	0.025
Cumene	98-82-8	No	391.2	12.25
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
1,4-Dichlorobenzene	106-46-7	No	720	22.5
o-Dichlorobenzene	95-50-1	No	480	15
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
2,6-Di- <i>tert</i> -butyl-p-cresol (butylated hydroxytoluene)	128-37-0	No	16.008	0.5
Ethyl Acetate	141-78-6	No	2239.2	70
Ethyl Alcohol	64-17-5	No	3000	94
Ethyl Benzene	100-41-4	No	696	21.75
Ethylene Glycol Vapor	107-21-1	No	20.304	6.35
Formaldehyde	50-00-0	No	0.01224	7.70E-05
Heptane (n-Heptane)	142-82-5	No	2616	82
Hexamethylene Diisocyanate	822-06-0	No	0.048	0.0015

<b>TAP</b>	<b>CAS</b>	<b>Particulate?</b>	<b>Screening Emission Rate (lb/day)<sup>(a)</sup></b>	<b>Modeled Concentration Limit (mg/m<sup>3</sup>)</b>
Hexane (n-Hexane)	110-54-3	No	288	9
Hydroquinone	123-31-9	No	3.192	0.1
Iron Oxide Fume (Fe <sub>2</sub> O <sub>3</sub> ) 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 Alcohol	67-63-0	No	1567.2	49
Isopropyl Acetate	108-21-4	No	1663.2	52
Kaolin	1332-58-7	Yes	3.192	0.1
Manganese as Mn, Dust & Compounds	7439-96-5	Yes	7.992	0.25
Magnesite	546-93-0	Yes	16.008	0.5
Methacrylic Acid	79-41-4	No	112.08	3.5
Methanol	67-56-1	No	415.2	13
1-Methoxy-2-Propanol Acetate	108-65-6	No	576	3.6
2-Methoxyethyl Acetate	110-49-6	No	38.4	1.2
Methyl Acetate	79-20-9	No	976.8	30.5
Methyl n-Amyl Ketone	110-43-0	No	376.8	11.75
Methyl Chloroform	71-55-6	No	3048	95.5
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 Isobutyl Ketone (MIBK)	108-10-1	No	328.8	10.25
Methyl Methacrylate	80-62-6	No	655.2	20.5
Methylene Chloride	75-09-2	No	0.0384	2.40E-04
Methylene Diisocyanate (MDI)	101-68-8	No	0.072	0.0025
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
Naphthalene	91-20-3	No	79.92	2.5
Nickel	7440-02-0	Yes	0.000648	4.20E-06
Nonane	111-84-2	No	1680	52.5
Pentane	109-66-0	No	2832	88.5
Phenol	108-95-2	No	30.48	0.95
Phosphoric Acid	7664-38-2	No	1.608	0.05
Propionic Acid	79-09-4	No	48	1.5
n-Propyl Acetate	109-60-4	No	1344	42
Propyl Alcohol	71-23-8	No	799.2	25
Selenium	7782-49-2	Yes	0.312	0.01

TAP	CAS	Particulate?	Screening Emission Rate (lb/day) <sup>(a)</sup>	Modeled Concentration Limit (mg/m <sup>3</sup> )
Silica – Amorphous, including: • Diatomaceous Earth (uncalcined) • Precipitated Silica • Silica Gel	61790-53-2 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
Styrene	100-42-5	No	160.08	1
Tetrahydrofuran	109-99-9	No	943.2	29.5
Toluene	108-88-3	No	600	18.75
Triethylamine	121-44-8	No	6.48	0.2
Trimethyl Benzene (Mixed and Individual Isomers)	25551-13-7	No	196.8	6.15
Vinyl Acetate	108-05-4	No	55.2	1.75
VM&P Naphtha	8032-32-4	No	2191.2	68.5
Xylene (o-, m-, p-isomers)	1330-20-7	No	696	21.75
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.

### 5.16 Demonstrate Coating Emission Limit Compliance

For each Daily Coating Usage Scenario, emissions from all coating operations shall be estimated and compared against the Coating Operation Emission Limits in Table 5.2:

- PM<sub>10</sub>/PM<sub>2.5</sub> emissions shall be estimated by multiplying each coating maximum daily coating 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 coating usage rate (gal/day) by the VOC content (lb/gal) for that coating material, and summing the total emissions from all coating materials (lb/day).
- HAP emissions shall be estimated by multiplying each coating maximum daily coating usage rate (gal/day) by the HAP content (lb/gal) for each coating material, and summing the total emissions from all coating materials (lb/day).
- For solids content, VOC content, and HAP 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, or HAP content is listed as below detection on SDS or other documentation, the HAP content shall be assumed equal to the coating density divided by 100 (i.e., 1% of density in lb/gal) when estimating emissions.

- When the solids content, VOC content, or HAP content cannot be determined from SDS or other documentation, the content shall be assumed equal to the density of the coating (lb/gal) when estimating emissions.
- The permittee shall compare estimated emissions for all coating materials against the Coating Operation Emission Limits in Table 5.2. The permittee shall not use or implement any Scenario that exceeds a Coating Operation Emission Limit.

## **Monitoring, Recordkeeping, and Reporting Requirements**

### **5.17 Coating Usage Scenario Monitoring**

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

- Only one Daily Coating 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.

### **5.18 Coating Material Usage Recordkeeping**

Each calendar day on which coating materials are used, the permittee shall collect and maintain records of the quantity of each coating material used, including but not limited to primers, stains, basecoats, glazes, sealers, lacquers, thinners, solvents, reducers, caulking, and adhesives to demonstrate compliance with Approved or Alternate Daily Coating Usage Limits.

### **5.19 Annual Limits**

To ensure compliance with annual limits, each calendar month, the permittee shall monitor and record the amount of each coating material used for the previous 12 calendar months (gal/yr).

### **5.20 Coating Material Purchase and Safety Data Sheet Recordkeeping**

For each coating material used at the facility, including but not limited to primers, stains, basecoats, glazes, sealers, lacquers, thinners, solvents, reducers, caulking, and adhesives, the permittee shall record and maintain the following records:

- Material purchase records
- Safety Data Sheets (SDS)

### **5.21 Coating Usage Scenario Reporting**

Each year, the permittee shall submit a report by May 1st on all Daily Coating Usage Scenarios used each calendar day during the previous 365-day period. The report shall include documentation supporting the TAP compliance demonstrations and the Coating Emission Limit compliance demonstrations relied upon for each Daily Coating Usage Scenario, and any modeling analyses conducted in each coating TAP compliance demonstration. 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 TAP Compliance Report" and shall be sent to:

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

**5.22 Paint Booth Filter Recordkeeping**

The permittee shall maintain documentation such as manufacturer's specification sheets that document the required minimum 99% paint booth filter efficiency.

**5.23 Spray Gun Recordkeeping**

The permittee shall maintain documentation, such as manufacturer's specification sheets, ensuring spray gun transfer efficiencies are 60% or greater.

**5.24 Odor Complaints**

The permittee shall maintain records of all odor complaints received to demonstrate compliance with Odor Limits. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

## 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; and

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

[IDAPA 58.01.01.211.01, 5/1/94]

- 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.

[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 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]